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Monday, 2 June 2025

Chair: Councillor P Peacock

Members of the Committee:

**Councillor R Cozens
Councillor S Crosby
Councillor L Brazier
Councillor S Forde**

**Councillor C Penny
Councillor P Taylor
Councillor J Kellas**

MEETING:	Cabinet
DATE:	Tuesday, 10 June 2025 at 6.00 pm
VENUE:	Civic Suite, Castle House, Great North Road, Newark, NG24 1BY
<p>You are hereby requested to attend the above Meeting to be held at the time/place and on the date mentioned above for the purpose of transacting the business on the Agenda as overleaf.</p> <p>If you have any queries please contact nigel.hill@newark-sherwooddc.gov.uk.</p>	

AGENDA

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None.	

NEWARK AND SHERWOOD DISTRICT COUNCIL

Minutes of the Meeting of **Cabinet** held in the Civic Suite, Castle House, Great North Road, Newark, NG24 1BY on Tuesday, 1 April 2025 at 6.00 pm.

PRESENT: Councillor P Peacock (Chair)

Councillor R Cozens, Councillor L Brazier, Councillor S Forde, Councillor C Penny, Councillor P Taylor and Councillor J Kellas

ALSO IN ATTENDANCE: Councillor N Allen, Councillor S Haynes, Councillor R Holloway and Councillor P Rainbow

APOLOGIES FOR ABSENCE: Councillor S Crosby

258 NOTIFICATION TO THOSE PRESENT THAT THE MEETING WILL BE RECORDED AND STREAMED ONLINE

The Leader advised that the proceedings were being audio recorded and live streamed by the Council.

259 DECLARATIONS OF INTEREST FROM MEMBERS AND OFFICERS

Councillor L Brazier declared an Other Registerable Interest in Agenda Item No. 6 – Levelling Up 3 - Programme Update – as a Member of Ollerton & Boughton Town Council.

260 MINUTES FROM THE PREVIOUS MEETING HELD ON 11 MARCH 2025

The minutes from the meeting held on 11 March 2025 were agreed as a correct record and signed by the Chair.

261 LEVELLING UP 3 - PROGRAMME UPDATE (KEY DECISION)

The Director – Planning & Growth presented a report which provided Cabinet with an update on the Levelling Up Fund 3 (LUF 3) programme and proposed key recommendations to the Cabinet regarding the delivery of the Ollerton and Clipstone regeneration projects. Following the update report presented to the Cabinet in December 2024, officers had continued to discuss the developments associated with the 'Shaping Sherwood's Revival Scheme' with the government and had continued to seek the necessary extension of the LUF 3 funding period to March 2028, following a pause of the national programme in 2024, and the prolonged confirmation of the £20m grant for the local scheme.

It was reported that in January 2025, the Council and government successfully formalised the £20m LUF 3 commitment to Sherwood through a Memorandum of Understanding (MoU). The MoU provided further assurance relating to the future funding in addition to the release of an initial draw down of LUF 3 grant of £1,264,211. However, it was noted that the essential deadline extension to March 2028 remained unconfirmed by the government at the current time.

AGREED (unanimously) that Cabinet:

- a) notes the updates associated with the LUF 3 Programme, including the recent execution of the Government Memorandum of Understanding (MoU), and the initial payment of LUF 3 grant to the Council, as detailed in paragraph 1.2 of the report.

Ollerton Town Centre Regeneration Scheme

- b) approves the reallocation of £450,000 of the capital budget of £500,000 approved by Cabinet on 10 December 2024, to revenue budget, as detailed in paragraph 2.5 of the report, funded by the LUF 3 grant;
- c) approves the addition of £68,000 within the Capital Programme, financed by grant, as detailed in paragraphs 1.5 and 1.6 of the report; and
- d) approves the addition of a £322,000 revenue budget, financed by grant, as detailed in paragraphs 1.5 and 1.6 of the report.

Clipstone Regeneration Scheme

- e) approves the reallocation of the capital budget of £200,000 approved by Cabinet on 10 December 2024, to revenue budget, as detailed in paragraph 2.6 of the report, funded by the LUF 3 grant; and
- f) notes the additional £40,000 revenue budget, funded by Government granted LUF 3 capacity funding, as detailed in paragraph 1.13 of the report.

Reasons for Decision:

The recommendations within the report aim to prevent further delays of both Ollerton and Clipstone projects, supporting the scheme to meet an anticipated March 2028 LUF 3 spend deadline. Without the provision of additional funding to progress key workstreams, the ability to meet a March 2028 spend deadline is further compromised and would present a subsequent risk regarding potential loss of funding.

Options Considered:

Consideration has been given as to whether both Ollerton and Clipstone should be placed into a secondary paused status, until the outstanding risks and matters noted in this report are resolved. This approach is not recommended at this stage, as by pausing both projects again, it is unlikely that either scheme will be able to defray the LUF 3 funds by March 2028, preventing transformational change to be delivered to the Ollerton and Clipstone communities. Furthermore, the budgets requested within this report are required to finalise the outstanding matters detailed in this report, and therefore progression is not possible without additional funding.

262 STRATEGIC HOUSING AND EMPLOYMENT LAND AVAILABILITY ASSESSMENT METHODOLOGY

The Business Manager – Planning Policy & Infrastructure presented a report which presented the draft Strategic Housing and Employment Land Availability Assessment (SHELAA) methodology and sought approval of the document for public consultation. The National Planning Policy Framework required all local authorities to prepare a SHELAA to identify a sufficient mix of sites for housing and employment. In order to assess each site, it was necessary for a methodology document to be prepared. This was attached as Appendix 1 to the report. The draft methodology document had been considered by the Planning Policy Board in February who had recommended it to the Cabinet for approval.

AGREED (unanimously) that Cabinet approve:

- a) the proposed contents of the Strategic Housing and Employment Land Availability (SHELAA) Assessment Methodology at Appendix 1 to the report; and
- b) undertaking the public consultation for a period of six weeks with relevant stakeholders on the proposed Methodology.

Reasons for Decision:

To allow the District Council to consult on the draft SHELAA Methodology.

Options Considered:

There is no formal requirement to consult on SHELAA methodology, but it is considered that by doing so it will ensure the site assessment process is robust.

263 BASSETLAW, NEWARK & SHERWOOD COMMUNITY SAFETY PARTNERSHIP STRATEGY (KEY DECISION)

The Business Manager – Public Protection presented a report which sought approval for a new Bassetlaw and Newark & Sherwood Community Safety Partnership Strategy. Each Community Safety Partnership (CSP) was required to have in place a Strategy and a delivery plan setting out key themes within the CSP. The Bassetlaw and Newark & Sherwood CSP was attached as Appendix 1 to the report, with the delivery plan at Appendix 2. The key themes in the Strategy were: serious violence against women and girls and domestic abuse; anti-social behaviour; vulnerability and contextual safeguarding; community cohesion; and neighbourhood crime. It was noted that the Strategy had been formally adopted by Bassetlaw District Council.

AGREED (unanimously) that Cabinet approve the adoption of the new Community Safety Strategy.

Reasons for Decision:

To ensure Newark and Sherwood District Council meet the requirement from the Community Safety Partnership by adopting the strategy. This directly links to the reduction of Crime and Anti-Social Behaviour Objective from the Community Plan.

Options Considered:

Community Safety Partnerships are required to have a strategy in place. This document has been adopted by Bassetlaw. There are no other alternative options.

264 DOMESTIC ABUSE POLICY (KEY DECISION)

The Business Manager – Public Protection presented a report which sought approval for a four-week public consultation period on a draft Domestic Abuse Policy, prior to formal approval. It was noted that every local authority in Nottinghamshire had committed to seek accreditation through the Domestic Abuse Housing Alliance which was being supported and funded by Nottinghamshire County Council. The draft policy was attached as Appendix 1 to the report and this set out what people could expect when contacting the Council and how the Council would support those impacted by domestic abuse. The draft policy would be shared with the Tenant Engagement Board, Engaged Tenants and key stakeholders, alongside the proposed public consultation.

AGREED (unanimously) that:

- a) approval be given for a four-week period public consultation for the draft Domestic Abuse Policy; and
- b) delegated authority be given to the Portfolio Holder for Public Protection & Community Relations in consultation with the Director - Communities & Environment to approve any amendments resulting from the consultation.

Reasons for Decision:

- To ensure compliance with the requirements of the Domestic Abuse Housing Alliance Accreditation;
- To continue to seek improvements for those facing Domestic Abuse; and
- The recommendations link directly to the Community Plan Objectives of Reducing Crime and Anti-Social Behaviour.

Options Considered:

A Domestic Abuse Policy is required to be in place in order to ensure compliance with the Domestic Abuse Housing Alliance Accreditation, there are no alternative options.

265 COMMUNITY PLAN REFRESH (KEY DECISION)

The Transformation and Service Improvement Officer presented a report which proposed a refreshed Community Plan for 2023-27 for recommendation to Full Council. The Community Plan was the key direction setting document used to outline the priorities and vision of the Council for a four-year term. The current Plan had been in place formally since December 2023 and senior Members and Portfolio Holders had been reviewing progress against the Plan and challenging what was outstanding as a priority and account for any emerging priorities which had arisen since the development of the Plan. The refreshed Community Plan was attached as Appendix 1 to the report, with the changes being highlighted in Appendix 2.

As part of the refresh, it was proposed to adapt and broaden out the action which described the Motion for the Ocean, to instead to outline the Council's ambition to work in conjunction with statutory authorities to promote good river and waterway health. The refreshed Community Plan had been presented to the Policy and Performance Improvement Committee at their meeting held on 10 March 2025, at which they recommended approval.

AGREED (with 6 votes for and 1 abstention) that:

- a) the refreshed Community Plan 2023-2027 be referred to Full Council for approval and adoption;
- b) the £45,000 budget that was allocated towards activities for Motion for the Ocean as part of the 2025/26 revenue budget setting, be re-allocated into the Flooding Defence Reserve to fund a further Community Resilience Grant Scheme in 2025/26; and
- c) the transfer of £10,000 from the Cleaner, Safer, Greener reserve to Environmental Services to allow the organisation of day-to-day activities around the commitment to grow ocean literacy (Motion for the Ocean) be approved.

Reasons for Decision:

The Community Plan 2023-2027 is the key document which will set the vision and direction of the Council during a four-year term. As such it is necessary that this document is refreshed throughout the four year term, to ensure the plan reflects the projects and initiatives which are ongoing or yet to be delivered.

Options Considered:

To not refresh the Community Plan for 2023-2027.

266 MANSFIELD CREMATORIUM REDEVELOPMENT (KEY DECISION)

The Assistant Director – Legal & Democratic Services presented a report which sought approval of the resolution by the Mansfield and District Joint Crematorium Committee (of which the Council is a constituent member) to redevelop Mansfield Crematorium and to approve the financial arrangements for the Council's contribution to the cost of redevelopment.

The Crematorium required either significant refurbishment or replacement, as was detailed in the exempt appendix to the report. The Joint Committee had carefully considered the available options and on 24 February 2025 unanimously resolved to endorse refurbishment, subject to approval by each constituent authority. It was reported that both Mansfield and Ashfield District Council's had resolved to endorse refurbishment and approve the applicable capital expenditure arrangements.

AGREED (unanimously) that Cabinet approve:

- a) Option C the high level refurbishment of Mansfield Crematorium as detailed in Exempt Appendix A to the report, and commencement of the refurbishment project;

- b) the allocation of the Usable Reserves to partially cover the VAT liability on the development, limiting the financial impact on each authority area for the refurbishment programme, as set out in Annex A within Exempt Appendix A to the report;
- c) the remaining total contribution by the Council, to pay the remaining VAT liability and year one deficit, as set out in paragraphs 2.45, 2.46 and Annex A within Exempt Appendix A to the report; and
- d) an increase to the Capital Programme by £211,900, funded by the Change Management Reserve, to fund the Council's contribution towards the high-level refurbishment works as suggested in Option C.

Reasons for Decision:

To ensure ongoing performance, viability and reputation of the Mansfield Crematorium.

Options Considered:

The Mansfield and District Joint Crematorium Committee has considered alternatives including new build, sale, closure and a lower-level refurbishment. These are all explored in detail in the exempt appendix to the report.

Meeting closed at 7.25 pm.

Chair



Report to: Cabinet Meeting: 10 June 2025

Portfolio Holder: Councillor Lee Brazier, Housing

Director Lead: Suzanne Shead, Director - Housing, Health & Wellbeing

Lead Officer: Ian Jackson, Careline Team Leader, Ext. 5233

Report Summary	
Type of Report	Open report / non-key decision
Report Title	Careline Service
Purpose of Report	To share with Cabinet the success of the Careline service. To provide insight into the vision for the future provision of the Careline Service and how it could be marketed.
Recommendations	That Cabinet: a) note the successes to date and the income generated from the Careline Service; and b) approve proposed budget for marketing of 10% of the income generated in year 24/25.
Alternative Options Considered	Standing still is an option, but continued business growth and external recognition of excellent, consistent service delivery places the Council in a good starting position through the optics of Local Government Reform.
Reason for Recommendations	To support the continued business growth and promotion of the Careline Service aligns with the Community Plan ambition 7 "Be a top performing, modern, accessible Council that get its everyday services right for the residents and businesses that it serves".

1.0 Background

- 1.1 The Careline service, run by the Council, offers customers the ability to call for assistance 24 hours a day, 365 days a year by simply pressing a button. As part of the service offering, the Careline installers visit and install a Careline. Careline Advisors, based in two of our Housing with Care schemes respond to any calls. When the alarm is activated the Careline Advisor will take the most appropriate action based on the information provided at that time and any known information about the user.

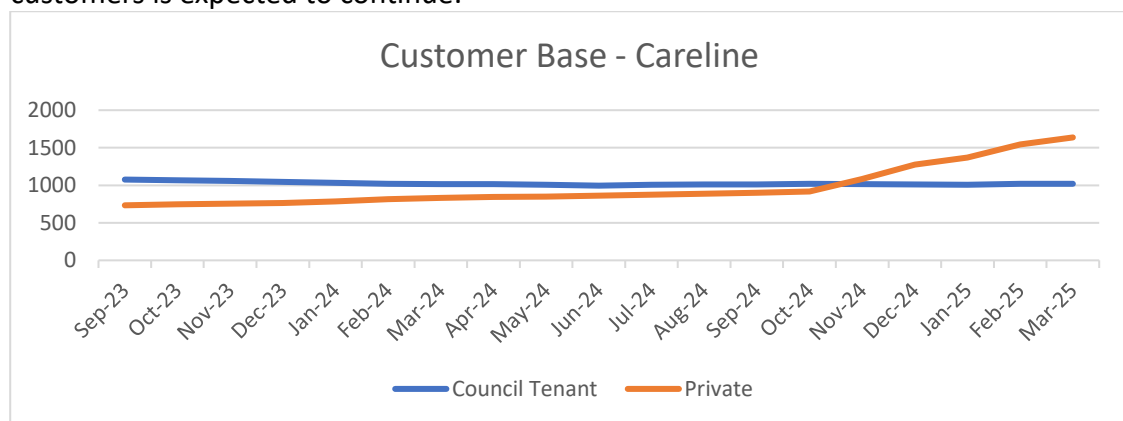
- 1.2 The Careline provides the service to both Tenant and Private users. Over the last two years, this has expanded across the Newark & Sherwood borders to include Ashfield, Bassetlaw, Gedling and Mansfield bringing in valuable income to the Council and providing a necessary service to allow those residents to continue to live independently in their own homes.
- 1.3 As advised by the Technology Services Association (TSA), the number of Alarm Receiving Centres (ARCs) has reduced in the UK. In 2020 there were just over 200 ARCs, this reduced to 170 in 2023 and then a constant decline to where we stand now with 156. This trend is likely to continue to fall given the up-front cost of the analogue to digital switchover. However, this is a vital service to many people and something that presents a great opportunity for the Council to not only support our tenants and residents but also to provide increased income.
- 1.4 In terms of Marketing, there has been no proactive marketing undertaken for the Careline Service. Those who take up the service hear about it through word of mouth.

2.0 **Statistics**

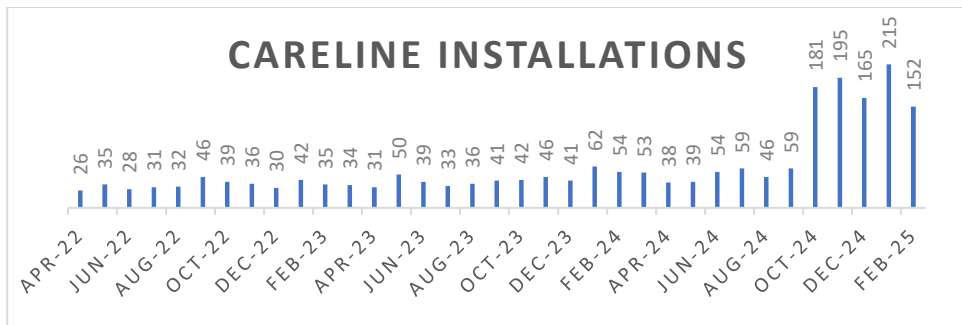
- 2.1 The graph below shows the number of customers signed up to the careline service and what type of customer they are (council tenant or private customer).

The private sector has seen an increase of 123% since September 2023 which means this revenue stream has more than doubled in this period. This is an increase from 733 to 1637 private customers.

With the expansion into the neighbouring districts, the trend for the increase in private customers is expected to continue.



- 2.2 In 2023 residents in our neighbouring districts were contacting us advising that they were struggling to access the service in their local area. This opened the exploration into the possibility of expansion and realisation that there was a gap in the market. Since July 2023 we have installed 595 carelines in neighbouring districts.
- 2.3 The graph below shows the impact of the recent Mansfield project. The Mansfield project was the acquisition of the private careline customers from Mansfield District Council as approved previously.



- 2.4 Even with the increase in volume of customers and calls, the call response times have still exceeded the measures of excellence set out by the TSA; consistently hitting almost 99% calls responded to within 60 seconds. The industry standard for calls being answered within 60 seconds is 97.5%.

3.0 Income Generation - Private Sector

- 3.1 The careline service has generated income from the private sector above what was forecast for this financial year even after the amendments for the Mansfield project.

Original Expected Income for rental and monitoring 24/25 - £219,450

Amended Expected Income for rental and monitoring 24/25 - £284,490

Actual Income for rental and monitoring (as at 24th March) - **£353,360.40**

Costs for the year are estimated to be £210,000 for 2024/25, providing an income of **£143,360.40**

This income, from the acquisition of the Mansfield scheme, could be matched again with appropriate marketing of the service, an incredibly exciting opportunity.

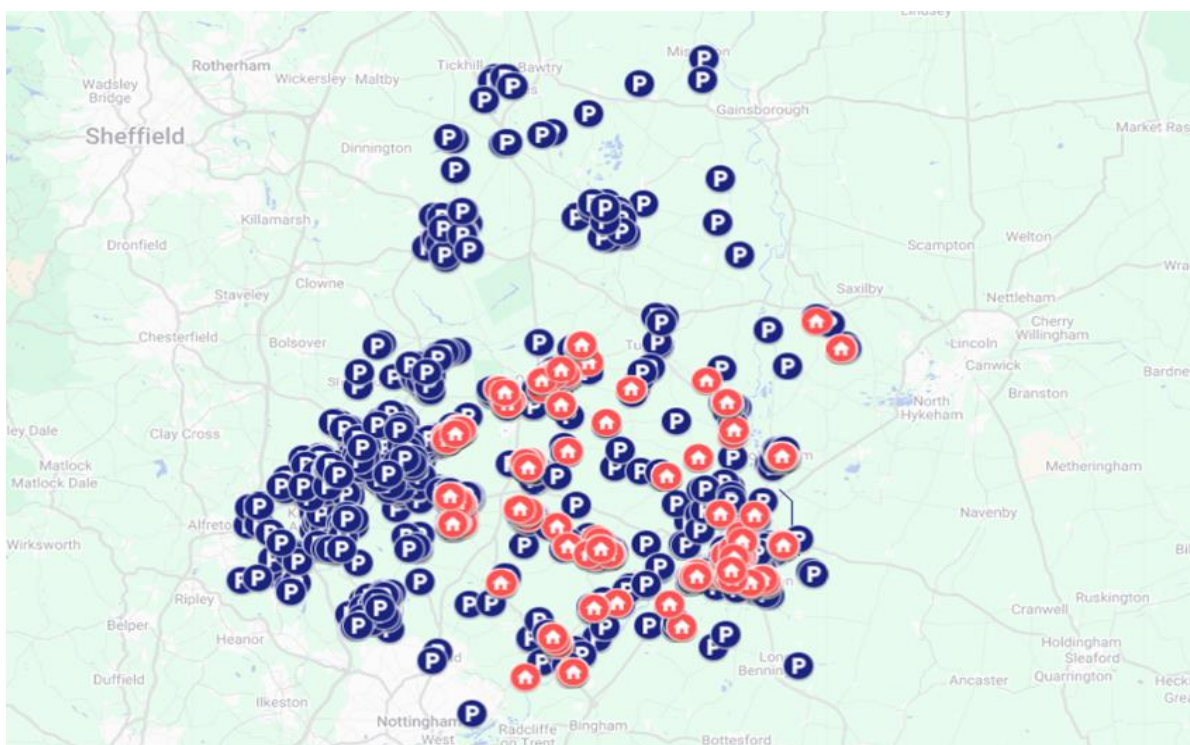
4.0 Proposal / Details of Options Considered

- 4.1 Based on our successes, our ambitious and forward-thinking vision for the future is to be the largest provider of choice in the County whilst delivering excellent Careline Services. To continue to be commercial and business like to increase income to the General Fund from the private sector take up.
- 4.2 Understanding that local Government Reform is around the corner, it would be beneficial to have a fully branded, well marketed and growing service which could continue to serve tenants and residents across the whole County. We are hoping to work with colleagues in our marketing and comms team on a marketing plan for the Careline service. Please see section 5 and section 9.
- 4.3 Data is essential for us to be able to demonstrate the impact that the Careline service delivers for our tenants and residents of both Newark and Sherwood and our neighbouring districts in which we now operate. Customer and Stakeholder engagement alongside this data will enable an informed service offer to be developed that is relevant and aligned with our Community Plan to serve people and improve lives, making a positive difference to those tenants and residents who receive our Careline service.

- 4.4 In our completion of analogue to digital switchover, the Council is already ahead of most neighbouring districts, having already installed over 50% or 1683 digital dispersed units, completion is on target to be completed by August 2025 and funding is already approved to achieve this project.

5.0 **Marketing**

- 5.1 The proposal is to develop a brand, marketing strategy and marketing action plan for the Careline Service. This will better enable the service opportunities of expansion in the private sector and to bid for external contracts.
- 5.2 Marketing the Careline Scheme helps to deliver the objective in the Community plan that states: *'Through the Commercialisation Strategy and action plan, continue to seek out and generate new sources of income, whilst retaining our public service ethos'*. This a service that already generates income for the Council and the focus of marketing the scheme could increase the income even more.
- 5.3 The service itself is one that strongly benefits older residents and tenants across the district and further afield. The Careline service is there for when they need it most and we can do more through marketing to ensure more of our residents and tenants are signed up to it; Enabling them to continue to live independently in their own home.
- 5.4 Unlike other competitors such as [Nottingham On Call](#), Careline has no branding and simply has [one page on our website](#). In terms of price comparison, [Nottingham On Call](#) charge £6.60 per week, compared to £26 per month via our Careline service. This makes us £31 cheaper across the year.
- 5.5 Unlike other services for the Council, the Careline Service can take on residents from outside the district. More users joined following the transfer from Mansfield and it covers a wide area that includes private and tenants in Mansfield, Gainsborough, Bawtry and even locations with Derby and Sheffield post codes.



- 5.6 An initial data mapping exercise has been undertaken by the marketing team to identify opportunities. Despite the growth of the service already, there are still gaps in the market that would be helped with the support of marketing, as outlined in 5.8. The above map shows locations of private customers (P) and tenant customers (House) across all areas, from NSDC to outside the district, including Yorkshire and Derbyshire. There is a clear divide where the service users stop, depicting an opportunity of growth in the south of Nottinghamshire and into Lincolnshire.
- 5.7 Supported living customers (naturally within the district) numbers are fairly small. For the size of Newark, there are not many on the list, this is similar to Southwell.
- 5.8 Other areas of low “supported living” uptake for size include Rainworth, Blidworth, Clipstone and Collingham. There are little/no supported living tenants receiving Careline in the villages of the district. This will largely be down to fewer District Council properties, but again, we may be missing a trick with the remoteness of the properties.
- 5.9 Data would suggest that we could do more targeted marketing of the service to our council tenants too via our tenancy teams, with the production of appropriate marketing collateral. Marketing to these sites would be much easier compared to private customers due to the regular communications we already have to tenants.
- 5.10 The Careline service brought in an income of £143,360 last year and there is clear indication that the service could be marketed to even better increase this.
- 5.11 It is recommended that Cabinet approve a marketing budget of £14,360. Housing colleagues have confirmed that this budget is available from the income generated. At the end of year one, it is proposed the £14,360 will go back into the budget it was taken from via the income generated from the campaign or it will be reinvested into a year two marketing plan subject to further approval. A marketing plan will be created, outlining how this will be spent with appropriate sign up and income targets included in the plan. This marketing plan will be submitted to Director of Housing for approval before implementation. There are clear opportunities to link in with the NHS hospitals and GP surgeries who can signpost residents and tenants to our scheme if appropriate material was made available to them to do so. In addition, the service could also be promoted through targeted information to relevant groups and organisations, digitally to adults with older parents and via a range of other channels and opportunities.
- 5.12 After one year of marketing the scheme, a review of uptake shall be undertaken to review the impact of the marketing and if there should be an increase or decrease of the budget.
- 5.13 The marketing of this project is possible following the completion of the restructure in the Communications and Marketing team, the creation of a Marketing and Sales Manager post. This post will oversee the project, supported by the Senior Communications Officer (HRA) and the marketing team. The branding, content, management of all marketing activity can be delivered in house, with the marketing budget only being spent on material and advertising. The cost of delivering this service in house, including creating the brand identity is in the region of around £30,000.

6.0 **Implications**

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection, Digital and Cyber Security, Equality and Diversity, Financial, Human Resources, Human Rights, Legal, Safeguarding and Sustainability, and where appropriate they have made reference to these implications and added suitable expert comment below where appropriate.

HR & Equalities implications HR2425/2105 FK

- 6.1 The recommendations above to grow the service will have implications for staffing levels within the team and consideration should be given to ensuring that changes are made at the right time so as not to negatively impact existing staff in terms of increase in workload, and to ensure that any new staff are onboarded and trained in a timely manner.
- 6.2 The existing team has remained stable for a significant period of time and care should be taken if increasing numbers that this is done in a way which maintains and develops the existing culture.
- 6.3 If the proposals above are approved, further consideration will be given to the staffing levels required to meet the anticipated increase. HR will be able to provide more detailed comment at that point.

ICT Implications

- 6.4 Additional software and hardware will be needed dependent on size and growth of service. Further reports will be submitted as needed in the future.
- 6.5 Hardware required to be moved for the Careline office move for which we may require ICT support.

Financial Implications - FIN24-25/8719

- 6.6 Table detailing the 2024/25 costs and income for the Careline service

	Budgeted income	Actual Income	Budgeted Costs	Actual Costs
GF	284,490	354,511	191,860	215,000
HRA	-	321,000	348,440	290,000

- 6.7 As per the above table, the income for 2024/25 has surpassed the expected amount for the private customers by £70,021 with the costs increasing by £23,140 meaning additional income of £46,881 has been generated in this financial year. The costs for the HRA are less than budget for at £290,000 compared to the budget at £348,440, making a saving of £58,440.

- 6.8 The marketing team are requesting a budget of £14,360 to advertise the GF service. It is proposed that the 'Invest to Save' reserve be used for this budget, and the reserve topped up at the end of the 2025/26 financial year with the increase in profits expected from these advertisements.

Legal Implications (LEG2526/7411)

- 6.9 Cabinet is the appropriate body to consider the content of this report. The Local Government Act 2003 gives local authorities the power to charge for services which they have a power but not a duty to provide. The level of income is restricted to the amount it costs to provide the services; this can include the full cost of all aspects of service provision. All attributable overheads can be taken into account when making this calculation including the Council's buildings and IT systems, and support services for example.

Tenant/Resident Implications – Customer Testimonials

- 6.10 Any additional Health and wellbeing services developed would be to enable customers to continue to live independently and potentially have delivered a bespoke package to suit their needs. Service offers will be co-produced with tenants and residents.
- 6.11 A very recent testimonial received following the Mansfield project demonstrates the positive impact our service has on our customers:

"This is to say a massive thank you for your team and council for agreeing to continue my dad's care line service Mansfield Notts. He had a fall around midnight last Sunday 9 March, he pressed his emergency button and within 3 hours had been taken into hospital by ambulance. He came home on Friday 14th March and continues to improve. He's 94 years old, without this service I am in no doubt he would not have survived or managed to call for help. Please let your team know they are life savers. Thank you." Kind regards..... (son).

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

None



Report to: Cabinet Meeting: 10 June 2025

Portfolio Holder: Councillor Lee Brazier, Housing

Director Lead: Suzanne Shead, Director - Housing, Health & Wellbeing

Lead Officer(s): Julie Davidson, Business Manager - Housing Services. Ext 5542

Report Summary	
Type of Report	Open report / non-key decision
Report Title	Good Neighbourhood Management Policy
Purpose of Report	This report sets out the Council's approach to managing complaints related to noise nuisance or disruption locally between neighbours, adopting a more mediatory methodology to foster positive relationships within our communities.
Recommendations	That Cabinet approve the Good Neighbourhood Management Policy.
Alternative Options Considered	The Council has the option to rely on the ASB Policy for dealing with noise and nuisance between neighbours, but good practice and alignment with both the Regulator for Social Housing and the Housing Ombudsman is to manage these relationships in a more mediatory way.
Reason for Recommendations	The Regulator for Social Housing and the Housing Ombudsman recommend the introduction of a Good Neighbourhood Management Policy which aligns with the Community Plan ambition 7 "Be a top performing, modern, accessible Council that get its everyday services right for the residents and businesses that it serves."

1.0 Background Information

- 1.1 The Regulator for Social Housing, in its Neighbourhood and Community Standard requires all registered housing providers to publish a policy which outlines how, in consultation with tenants and leaseholders, the Council will work to maintain and enhance the neighbourhoods surrounding their homes.
- 1.2 This Good Neighbourhood Management Policy outlines the Council's approach to managing complaints and allegations where the situation is not defined as anti-social behaviour (ASB).

- 1.3 The Housing Ombudsman issued a spotlight report on Noise Complaints, providing advice and guidance to landlords on the unfairness of dealing with noise nuisance as ASB – requiring them to “develop a strategy for handling non-statutory noise seriously, sensitively and proportionately”. A summary of this report can be found at **Appendix 1**.
- 1.4 This policy provides tenants, leaseholders and residents with a more mediatory, sensitive approach when they are complaining or being complained about regarding noise nuisance – it’s the right thing to do.

2.0 Proposal/Details of Options Considered

- 2.1 The Council has the option to rely on the ASB Policy for dealing with noise and nuisance between neighbours, but good practice and alignment with both the Regulator for Social Housing and the Housing Ombudsman is to manage these relationships in a better way by encouraging households to understand how they are residing in their home can affect those living next door or nearby.

3.0 Tenant Feedback

- 3.1 Initial tenant feedback from the first drafts were that the policy did not clarify the intention to avoid conflict, and if required achieve conflict resolution, between parties; and that potentially the title ‘Good Neighbourhood Management Policy’ may create some confusion without clear explanation. One clear voice was that ‘I understand the aims that the policy is trying to achieve, breaching the gap between ASB and normal day to day living situations that may have caused upset.’
- 3.2 The early drafts referred to "our definition of ASB", tenant feedback questioned this terminology, ‘as we know there is no real finite definition of ASB so where are we getting ours from? I wonder if the word ‘our’ is the most appropriate to use?’ the wording was changed to reflect this.
- 3.3 The later revisions have been more favourably received, additional work is needed to produce a much more succinct easy read version, with graphics, for publication on the Council website and social media.
- 3.4 Noting in section 5.3 the reference to ‘We will actively consider the individual support needs of those involved’, feedback included ‘(I am) really pleased to see that this is mentioned specifically. Especially being an anxiety sufferer myself; pleased to see this will be a specific factor for both parties involved.’
- 3.5 The policy has had several revisions in tone, content, wording and style in response to tenant feedback. Future iterations would benefit from a blank page starting point with tenants suitably invested and upskilled to enable co-creation.

4.0 Implications

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate.

Financial Implications - FIN25-26/2063

- 4.1 There are no direct financial implications arising from this report that can be quantified, but any changes in the policy that have a financial impact can be funded from existing budgets in the Housing, Health and Wellbeing directorate.

HR & Equalities implications HR2425/9458 FK

- 4.2 There are no direct HR and Equalities implications in relation to our people as a result of implementing a new policy in relation to dealing with non-statutory noise complaints. However, once the policy is finalised and approved, it should be ensured that all relevant staff understand the content and how to apply it.

ICT Implications

- 4.3 There are no direct Digital and Cyber implications arising from this report that can be quantified; however, it is recognised that a tell us once approach to ASB is mandatory and therefore any digital platforms and processes that arise on the back of this policy must integrate with each another.

Legal Implications LEG2425/1317

- 4.4 The recommendations of this Report are supportable. Whilst there is no identifiable legal obligation to have a specific noise and nuisance policy, not having one is likely to put the Council at odds with both the Housing Ombudsman and The Regulator for Social Housing in their expectations in how the Council deals with noise and nuisance complaints that do not on their face meet the threshold for enforcement through the current recognised methods under nuisance or anti-social behaviour legislation.
- 4.5 Adopting an early intervention may negate the need for legal action further down the line under either piece of legislation and could avoid the costs and time involved in this type of litigation.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

None

APPENDIX 1

Document Name	Good Neighbourhood Management Policy
Effective Date	July 2025
Date for Review	July 2028
Version Number	1
Approved by	Cabinet
Responsible Business Manager	Business Manager Housing Services

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Newark and Sherwood District Council

Good Neighbourhood Management Policy
2025 - 2028

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1. Introduction

1.1 Newark and Sherwood District Council is dedicated to delivering excellent customer service, ensuring that every interaction with us results in a positive experience.

In line with the Neighbourhood and Community Standard, The Regulator of Social Housing requires all registered housing providers to publish a policy which outlines how, in consultation with tenants and leaseholders, the Council will work to maintain and enhance the neighbourhoods surrounding their homes.

1.2 The Council is committed to maintaining safe, clean, and attractive neighbourhoods where local people and communities can live, work, and thrive. The tenancy agreements for council tenants and leases for leaseholders clearly outline the responsibilities and expectations of all parties involved.

Effective neighbourhood management is essential to achieving these goals. It reflects our proactive approach to fostering positive relationships between neighbours in our estates, blocks, and street properties across the district. Good management not only enhances the quality of life for all residents but also helps to prevent issues such as anti-social behaviour, neighbour disputes, and crime.

1.3 This policy outlines the support tenants, leaseholders, and residents can expect when dealing with issues involving neighbours. It describes how the Council's Housing Services Team will approach and resolve complaints related to nuisance or disruption.

The Council's internal neighbourhood management procedure details the steps taken to address such reports and work towards a resolution, ensuring that all parties involved are treated fairly and with respect.

1.4 The Good Neighbourhood Management Policy states what tenants and leaseholders can expect:

- Good management of council housing neighbourhoods and shared areas.
- Continued building of strong working relations with our partnership agencies to maintain safe, clean, and attractive neighbourhoods.
- A fair and transparent assessment of reports of noise nuisance and adopting the most effective course of action.
- A proactive approach to the reported problem.
- A commitment to listen, understand, and communicate promptly and transparently with all parties.
- A preventative approach in housing allocations to avoid repeat situations where lifestyle and/or structural nuisance is a known issue.
- A commitment to continually improve the way we deliver services to our customers.

2. Aims of the Policy

2.1 This policy aims to ensure that tenants, leaseholders, and residents can enjoy their homes in a quiet, safe, clean, and secure environment.

2.2 The policy seeks to foster and strengthen positive relationships between neighbouring residents of all tenures. Cooperation and support from all parties is essential to improving situations. If any party refuses a reasonable request, we may be unable to provide further assistance. In such cases, this will be clearly communicated to all parties involved.

2.3 The goal of this policy is to engage, explain, and encourage before any type of enforcement, to facilitate understanding and resolution, and not to assign fault or place blame.

2.4 Issues addressed under this policy are often the result of circumstances rather than an intent to cause harm. Our aim is to raise awareness, promote understanding, and encourage compromise.

3. Good Neighbourhood Management

3.1 When new tenants move into a Council home a welcome pack is provided which includes a tenancy agreement, an outline of tenant rights and responsibilities, and 'How to Be a Good Neighbour' guidance to help create a positive and respectful community for everyone.

3.2 The Council encourages tenants to build positive relationships with their neighbours by following good neighbour principles. To support this, the Council:

- Run quarterly Community Link Group meetings across the district facilitated by the Tenancy Team for tenants to meet with council officers informally.
- Expect all employees to adopt a 'don't walk ethos' and to be the eyes and ears across within our neighbourhoods.
- Employ Tenancy Teams to manage tenancies, encourage sustainment, and facilitate involvement.

3.3 To support maintaining safe, clean, and attractive neighbourhoods the Council:

- Monitor our estates and neighbourhoods regularly.
- Proactively engage and encourage tenants to live in a neighbourly way.
- Have exceptional working relationships with partner organisations to resolve problems.
- Inspect Council grounds, neighbourhoods, community centres and blocks, reporting defects and areas of concern for remedial action.
- Run tenant inspection and scrutiny programmes for gardens, grounds and communal cleaning areas.
- Hold at least annual estate and neighbourhood Walkabouts with NSDC tenants, residents, members and local partners.
- Run schemes such as the Garden Scheme; Tree Scheme; Estate Improvement Scheme; proactive Additional Tenancy Support Assistance; noise monitoring, hoarding panel, community hubs, targeted support for people who are struggling to maintain a

tenancy; and a variety of grant schemes available to enhance neighbourhoods.

4. Nuisance and Anti-Social Behaviour

4.1 Some behaviours, while frustrating and upsetting to residents, may create tension between neighbours and the wider community without necessarily being classified as Anti-Social Behaviour (ASB). When the behaviour does not meet the criteria for ASB and is unlikely to be a tenancy breach, it requires a different, more tailored approach.

4.2 Anti-social behaviour is a broad term that encompasses a range of actions. Legislation defines housing-related ASB as behaviour that causes, or is likely to cause, nuisance or annoyance. This is a low threshold, and while certain behaviours may be nuisances to individuals, they may not be reasonable or appropriate to classify as ASB.

4.3 Examples of nuisance behaviour that may be intolerable to one party but not necessarily considered ASB include, but are not limited to:

- Issues with parking spaces, particularly where there are no designated spots or laws are being ignored.
- Disputes over the placement of wheelie bins.
- Boundary disagreements.
- Unreasonable cooking smells.
- Reasonable living noises such as a baby crying, children playing, flushing toilets, general shutting of doors, vacuuming, DIY projects, using household appliances during acceptable hours, particularly in upper-floor flats; and lawn mowing.
- Reasonable noise that impacts on shift workers.

4.4 One resident may be affected by a neighbour's behaviour, even if no harm is intended. For example, noise from everyday living might carry through thin walls.

4.5 The Council will not label residents as perpetrators in these nuisance cases or usually take legal action. We are committed to promoting good relationships and while our options may be limited, we will do our best to offer support and guidance to help resolve issues.

5. Nuisance Reports - What You Can Expect

5.1 Fair and Transparent Assessment and Prioritisation

The Council is committed to a fair and transparent approach when assessing and prioritising reports of nuisance behaviour, ensuring that the most effective course of action is taken. Initial details may be collected by any of the Council's officers; at the earliest opportunity an officer allocated the case will contact the complainant to gather the necessary information and fully understand the situation.

The Housing Services Team will triage all reports of nuisance behaviour using a matrix of options, see Appendix One, and carry out a risk assessment to determine the prioritisation of managing each nuisance report.

Triage is defined as conducting a preliminary assessment to determine the urgency and nature of the need for action.

If one party is in private accommodation the team will liaise with colleagues in Environmental Health to work through the triage process in conjunction with their procedures.

If the nuisance reported qualifies as Anti-Social Behaviour (ASB), it will be handled under the ASB Policy; otherwise, it will fall under this policy.

The Housing Services team will inform the complainant as soon as possible about which policy will govern the matter and the reasoning behind this decision.

Triage of the nuisance report will involve:

- Data Collection
- Identifying the nature and category of nuisance
- Identifying the type, frequency, time of day, and duration of the nuisance
- Understanding the severity of impact on the party/parties
- Understanding what existing mitigation efforts have been tried
- Assessing the priority of action based on the information gathered

5.2 Proactive Problem Resolution

The Housing Services Team will work with the complainant to identify, and provide support for, any initial courses of action that may deescalate the situation.

While the team will always consider the impact and any harm caused by the nuisance, this does not automatically mean that anyone is at fault. For instance, if noise is transferring between properties due to poor sound insulation or thin walls, this may have a significant effect. However, if the other party is simply carrying out normal living activities, it would not be fair to hold them responsible for the disturbance. In these situations, the team will focus on improving sound insulation, supporting the complainant, and working with the other party to explore ways to reduce the nuisance.

The team will discuss with the complainant any number of options for resolving the issue which may include proposing the wording for a conversation; sending the 'Good Neighbour Postcard'; supporting access to mediation; working out a Good Neighbour Agreement; accessing the Victim Care Fund; working with other partner agencies e.g. The Council's ASB Team, Environmental Health, Remedi, Neighbourhood Watch, and local Police teams.

All parties involved, including relevant partner agencies, will be contacted in a timely and proactive manner as agreed at the start of the case management process. The goal is to support tenants in resolving the issue without unnecessary delay.

Because these situations rarely involve tenancy breaches or Anti-Social Behaviour (ASB), legal action is unlikely to be part of the response.

Once all appropriate options have been explored and no further action can be taken, the team will inform all parties involved that no additional support can be provided.

Proactive resolution of the nuisance report will include:

- Determining the action to take
- Taking the action
- Documenting and tracking the situation
- Following up as agreed with all parties
- Assessing the effectiveness of the solution/s
- Documenting and implementing any learning from the nuisance case

5.3 Commitment to Listening, Understanding, and Communicating

Throughout the process, Council officers will communicate fairly and transparently with all parties, at the agreed frequency and in the agreed methods.

The Housing Services Team will actively consider the individual support needs of those involved.

The Council recognises that a person's health and well-being can affect how they experience and respond to certain situations. When receiving nuisance reports, the team will consider whether any party has any health-related needs that may require assistance.

This may require more information to assess the situation properly. The team may ask for this information directly, or for consent to gather it on the party's behalf. While sharing this information is voluntary, not providing it could limit the support the Council is able to offer.

The Council understands that personal circumstances can sometimes impact a person's tolerance, perception, or ability to manage certain situations. Where these factors are identified, we will work to make suitable referrals and provide additional support.

5.4 Commitment to Continuous Improvement

The Council is dedicated to continually improving the way services are delivered to our customers. We will explore feasible actions that the Council can take to resolve each situation, prevent its recurrence, and involve all parties in shaping future service delivery standards.

The Council collects and uses feedback from Residents, Tenants and Leaseholders, to drive improvements in meeting customer standards. The Council's performance against its Community Plan is measured, reported and [published](#) quarterly on the NSDC website as are the [results](#) of the Tenant Satisfaction Measures Survey.

5.5 Preventative Approach in Housing Allocations

To avoid repeating situations involving lifestyle or structural nuisance, we will review housing allocations to identify potential risks and take mitigating action in line with the Allocations Scheme not to place tenants or leaseholders in properties where noise cannot be mitigated.

Wherever practicably possible the Council will seek to address any known structural issues within properties that contribute to nuisance reports.

6. Partnership Working and Information Sharing

6.1 There may be situations where the Council cannot resolve an issue alone and will need to collaborate with partner agencies, with whom we have excellent working relationships. In such cases, information may be shared with relevant partners to ensure the best possible support and guidance is provided to all parties involved.

6.2 In some instances, this may need to involve medical professionals, social prescribers, the police, or other organisations to help address the situation effectively.

6.3 We are committed to sharing, storing, and disposing of information in accordance with relevant legislation and local information-sharing protocols.

7. Requests for Confidentiality

7.1 This policy aims to build positive relationships, so we may not be able to help if complainants wish to remain anonymous. Open communication is key to resolving issues.

7.2 In some cases, The Council will be unable to guarantee confidentiality, such as when there are safeguarding concerns, or a crime has been committed.

7.3 The Council appreciates it can be hard to see a situation objectively when facing difficult behaviour; where parties do not always agree with the decisions taken a full explanation will be given.

8. Making a Complaint or Providing Feedback

8.1 The Council has a Customer Complaints and Feedback Policy. We welcome both complaints and feedback. If we are doing something wrong or if you're not satisfied with our service, please let us know. Equally, if you're happy with something we've done or want to share positive feedback, we'd love to hear about it.

8.2 You can submit a complaint or provide feedback in a variety of ways: online, by letter, telephone, email, social media, in person, or through someone acting on your behalf.

8.3 Details can be found here:

[Customer complaints and feedback | Newark & Sherwood District Council](#)

9. Tenant Co-production and Engagement

9.1 When creating this policy, the Council worked with tenants to influence its structure. Tenants told us it was important to have clear communication from start to finish, respect between landlords and tenants/leaseholders, and for the Council to be transparent in its actions.

10. Equality & Diversity

10.1 We are committed to providing equal and fair access to our services, considering the individual needs of tenants and their households. We will make reasonable adjustments throughout the repairs process as needed, in line with our policy. We treat everyone fairly and with respect.

All staff receive mandatory Equality, Diversity, and Inclusion training, which is monitored by our internal team. Our Equality, Diversity, and Inclusion Strategy complies with the Equality Act 2010.

Approval, Consultation and Review

Document Title	NSDC Good Neighbourhood Management Policy		
Version Number	1.0	Protective Marking	Official
Lead Director	Housing Health and Wellbeing		
Portfolio	Housing		
Consultation	Tenant Engagement Board	Policy & Performance Improvement Committee	
	Community Link Groups	Colleagues	
Approval Dates	SLT: April 2025		
	Portfolio Holder: May 2025		
	Cabinet: July 2025		
Review Dates	Desktop:	July 2026	
	Desktop:	July 2027	
	Full:	July 2028	

Appendix One

Triage Prioritisation Matrix

Triage involves:

- Data Collection
- Identifying the nature and category of nuisance
- Identifying the type, frequency, time of day, and duration of the nuisance
- Understanding the severity of impact on the party/parties
- Understanding what existing mitigation efforts have been tried
- Assessing the priority of action based on the information gathered

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Report to: Cabinet Meeting: 10 June 2025

Portfolio Holders: Councillor Claire Penny, Sustainable Economic Development
Councillor Paul Peacock, Strategy, Performance & Finance

Director Leads: Matt Lamb, Director - Planning & Growth
Sanjiv Kohli, Director - Resources

Lead Officers: Neil Cuttall, Business Manager Economic Growth & Visitor Economy, Ext. 5853
Sarah Husselbee, Programmes Manager, Ext. 5802

Report Summary	
Type of Report	Open Report / Key - Decision
Report Title	UK Shared Prosperity Fund and Rural England Prosperity Fund Grants 2025-2026
Purpose of Report	To provide an update on the proposed grants throughout 2025-2026, funded by the Rural England Prosperity (REPF)/UK Shared Prosperity Fund (UKSPF).
Recommendations	<p>That Cabinet approve:</p> <ul style="list-style-type: none"> a) the addition of £267,369 within the 2025-2026 capital programme, funded by incoming Rural England Prosperity Fund (REPF) grant, as detailed in paragraph 1.3 of the report; and b) the proposed approach to managing the REPF and UKSPF grant schemes in 2025-2026, including the application, appraisal and award process as detailed in paragraph 1.9 of the report (Table 1), with delegation to the S151 Officer to approve individual grant allocations.
Alternative Options Considered	There is the opportunity not to accept future REPF grant funding allocated to the district and to decline participation in the scheme. This approach has been discounted from the proposals outlined within this report as it would re-present a missed opportunity to invest in local rural communities, supporting the Council's Economic Growth Strategy and Community Plan objectives.

Reason for Recommendations	The proposed processes set out within this report facilitates prompt and flexible delivery of grants, considering the requirement for any unspent funds after 31 March 2026, to be returned to Government. In addition, the process established is objective, open and transparent, avoiding any conflicts of interest, as set out as a clear requirement within the Governments Grants Functional Standard, demonstrating a best practice approach to managing grants.
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1.0 Background Information

- 1.1 On 18 February 2025, a report was presented to Cabinet to announce the Government's 12-month extension to the UK Shared Prosperity Fund (UKSPF) programme from April 2025 to March 2026, to the value of £1.34m in Newark and Sherwood. The report confirmed local uses of the UKSPF funds in 2025-2026, committing the grant to several existing projects, across three themes of Communities and Place, People and Skills and Supporting Local Businesses. The selected list of local UKSPF projects, as approved by Cabinet for delivery throughout the current financial year, is provided in Appendix A of this report.
- 1.2 Cabinet may re-call that in accordance with the 2022 devolution deal, the UKSPF allocation of £1.34m to Newark and Sherwood will be passported by the East Midlands Combined County Authority (EMCCA), as the replacement Lead Funding Recipient for the region. It is positive to report that this funding commitment to the area is now formalised through a grant award to the Council, from EMCCA.
- 1.3 In March 2025, the Government later confirmed an additional 12-month extension to the Rural England Prosperity Fund (REPF), until March 2026, known as the 'top-up' to UKSPF, for eligible rural areas. This announcement will provide a further £267,369 of capital funding for the district this financial year, in addition to the £1.34m of UKSPF previously reported. The additional funding will also be passported by EMCCA to the Council and incorporated within the existing grant funding agreement (UKSPF/REPF), with a requirement to spend by 31st March 2026.
- 1.4 The REPF is specifically integrated within the UKSPF programme and will be monitored and reported to EMCCA and Government in a combined approach. The rural top-up is designed to address the challenges faced by rural areas such as social isolation, access to opportunity and rural economic growth. The addition of REPF is introduced by Government and detailed within the prospectus to operate as a capital grant scheme, available to support organisations and projects located within areas pre - determined as 'rural' by the Department for Environment, Farming and Rural Affairs (DEFRA). It should be noted that not all of Newark and Sherwood is considered rural for the purpose of REPF, with areas in Newark Town, Balderton and Clipstone excluded from the funding.

1.5 Throughout 2022 to 2025, the UKSPF supported a variety of local activity delivered through a combination of in-house led projects, commissioning, procurement and grant funding opportunities for local organisations. The REPF was first awarded to the Council by Government between 2023 and 2025, to be delivered as a capital grants scheme, in accordance with the uses set out within the fund guidance. This resulted in the provision of financial support to a number of local organisations to accelerate rural business growth and diversification, as well as new and improved rural community infrastructure. This included grants for tourism sites, event and hospitality venues, sports clubs, community venues and active travel improvements. The local process followed engagement with DEFRA, the voluntary and community sector, neighbouring authorities and rural representatives such as the Community Land Association (CLA), National Farmers Union (NFU) and Rural Community Action Nottinghamshire (RCAN). Whilst the full impact of investment will form part of a wider programme evaluation finalised and circulated Autumn 2025, high level local achievements across the UKSPF/REPF programme up to March 2025, include:

- 342 businesses supported
- 91 jobs safeguarded
- 24 jobs created
- 28 businesses decarbonisation plans developed
- 63 businesses with improved sustainability
- 85 businesses with improved productivity
- 6 new businesses created
- 266 residents gaining life skills
- 42 economically inactive residents newly in job searching
- 162 residents completing training courses or obtaining qualifications
- 653 residents volunteering
- Over 3000 trees planted
- 120 community events delivered
- 15 community facilities created or improved

1.6 As specified within the scheme prospectus, the role of Local Authorities through the REPF, is to deliver and manage grant funding calls, contract with successful applicants and monitor projects thereafter. Funding is available for non for profit and community organisations, as well as commercial enterprises, explicitly in the form of capital grants. This includes support for rural businesses to develop new products and facilities that will be of wider benefit to the local economy (such as farm businesses looking to diversify income streams), as well as support for new and improved community infrastructure, providing essential community services and assets for local people and businesses to benefit the local economy. The full list of the REPF eligible interventions, as provided by Government, is available in Appendix B of this report.

1.7 In accordance with the Governments Grants Functional Standard, all grants must be competitive by default, and subject to a robust competitive process, demonstrating impartiality and avoiding conflicts of interest. For the purpose of the REPF, Local

Authorities are required to develop all grant related documentation including grant application forms, guidance, an appraisal process and funding agreements. It is at the discretion of the Local Authority to determine the most appropriate grant criteria, thresholds for awards, and match funding requirements depending on local context, but with recognition of the overall objectives and intended outcomes of investment, as set by Government.

- 1.8 In addition to the 2025-2026 REPF grant budget totalling £267,369, a revenue commitment of £100,000 of UKSPF was approved by Cabinet in February 2025, to enable the continued delivery of small and micro business grants, following successful pilot in 2024-2025, and subject to process development by Officers. This commitment follows strategic engagement with EMCCA, local business support providers, and neighbouring authorities, to determine the most appropriate approach to providing a breadth of local business support, including specialist advice, guidance and grant funding across the region. The availability of business grants will support the achievement of the UKSPF objectives and the local Economic Growth Strategy, by providing funding to scale up small and micro businesses (50 FTE or less) across the district, through increasing productivity, sustainability, and/or creating jobs.
- 1.9 In determining the most appropriate local process, funding and match thresholds for both the UKSPF/REPF grant funding opportunities above throughout 2025-2026, the Council has engaged with key partners, and considered the wider funding landscape, to avoid duplication and address identified gaps in support. Furthermore, the proposals reflect the knowledge obtained, and evaluation of previous UKSPF/REPF grant schemes, recognising best practice approaches to obtaining value for money and maximum outcomes for local people and places. With this in mind, the proposed approach to delivery of the REPF grants and UKSPF business grants, throughout 2025-2026, is as follows:

Table 1. REPF/UKSPF Grants Process 2025-2026

Indicative Date	Process
June 2025	<p>Full grant criteria, application and appraisal documentation developed and finalised by Officers (Economic Growth and Visitor Economy), in accordance with requirements and conditions of UKSPF/REPF prospectus.</p> <ul style="list-style-type: none"> • REPF (£267k) – Grants between £10,000 and £40,000 to support rural based projects, with a requirement of 20% match funding from community organisations and 40% match funding for commercial enterprises. Funding to be eligible for interventions, as detailed in Appendix B. • UKSPF (£100k) – Grants between £2,500 and £10,000, with a requirement of 40% match funding. Funding to be eligible to scale up a select number of small and micro businesses (50

	FTE or less) across the district, specifically for projects that demonstrate outcomes through increased productivity, sustainability and job creation.
June/July 2025	Application window for both REPF grants and UKSPF business grants.
July/August 2025	<p>Grant applications appraised by a panel of internal, independent Senior Officers against a pre-determined scoring matrix. Full scoring matrix and weightings to be published alongside guidance, and will consider alignment to:</p> <ul style="list-style-type: none"> • UKSPF/REPF objectives, the local Community Plan and Economic Growth Strategy. • Demonstration of local need and/or opportunity for investment. • The impact of investment (achievement of outputs and outcomes). • Consideration of equality, diversity and sustainability implications. • Demonstration of risk and deliverability within required timescales.
August 2025	<p>Recommended grant awards presented to the Council's S151 Officer for approval. Grant agreements finalised subject to due-diligence checks.</p> <p>List of awards circulated.</p>
September 2025 – March 2026	<p>Grant funding period, monitoring and evaluation. Outcomes to be monitored include, but are not limited to:</p> <ul style="list-style-type: none"> • No. of jobs created. • No. of businesses with increased productivity. • No. of businesses with improved sustainability. • No. of residents reached/community groups supported. • Amount of infrastructure/community space improved. • Increased users of spaces, volunteers, active members of community groups. • Improved accessibility, social isolation and safety. • Co2 improvements. • Increased visitors and footfall at tourism sites.

- 1.10 In accordance with a competitive process, it is anticipated that not all grant applications will be successful due to funding availability, and funding would be awarded to applications that score the highest, demonstrating most impactful outcomes. Support will be provided to any unsuccessful applicants in the form of referrals for advice/guidance and access to Grant Finder searches. In the unlikely event of a forecasted underspend, alternative commitments of the UKSPF/REPF grant will be presented to the S151 Officer for approval, in accordance with the scheme objectives

and the grant funding agreement finalised with EMCCA. This approach will support flexible and proactive delivery, maximising local investment in rural communities within the grant funding period ending March 2026.

2.0 Implications

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate.

- 2.1 In accordance with the UKSPF/REPF Government prospectus, the grant appraisal process will consider how applicants address both environmental sustainability implications, as well as equality and diversity implications.
- 2.2 The grant process will be managed by dedicated Programme Resource within the Economic Growth Team including the Programmes Manager and Economic Growth Officer.

Legal Implications LEG2526/2819

- 2.3 The Localism Act 2011 under section 1 gives the Council the "power to do anything that individuals generally may do", and may do it "for, or otherwise than for, the benefit of the authority, its area or persons resident or present in its area". These powers give the Council the power to both receive and award grants to deliver projects such as those outlined within this report within the Newark & Sherwood District.
- 2.4 As noted in 1.3 of this report, the grant funding passported by EMCCA to the Council will be formalised through a completed grant funding agreement to be issued by EMCCA and signed by the S151 Officer on behalf of the Accountable Body. This agreement is to be reviewed by the Legal team to evaluate its risks and implications prior to signing.
- 2.5 Grant funding agreements will be issued by the Council to successful Grant Recipients, who qualify to be awarded funding by the Council. This will be in compliance with the UK Subsidy Control Act; the basic principles of the Council's Contract Procedure Rules; and with Part E para 16.4.6 of the Financial Regulations which state that the 'awarding of grants by the Council or on behalf of the Council must be carried out under the principles of openness, fairness, non-discrimination, and value for money'.

Financial Implications (FIN25-26/7366)

- 2.6 The REPF grant is 100% Capital, therefore, to facilitate the grant scheme as described in the table at 1.9 of the report, a budget should be set up in the Capital Programme for £267,369, financed by the grant.
- 2.7 The UKSPF described above, relates only to revenue and the budget is already available based on the grant awarded to manage the proposed grant scheme.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

Levelling Up White Paper, 2022

[Government Functional Standard GovS 015: Grants - GOV.UK](#)

Levelling Up Fund Prospectus and Guidance, 2022

Sherwood Levelling Up Bid, July 2022

Cabinet Report, Levelling Up Submission and UK Shared Prosperity Fund, June 2022

Cabinet Report, Sherwood Levelling Up, Long Term Plan for Towns Fund and UKSPF / UKRPF Fund Update, November 2024

[Rural England Prosperity Fund: prospectus - GOV.UK](#)

Appendix A - UKSPF Project Commitments 25-26 (Cabinet February 2025)

<u>Project 25-26</u>	<u>Delivery Approach</u>	<u>Commitment</u>
Small Business Grant Scheme Grants to support small and micro business productivity and sustainability.	Grant application, appraisal, and monitoring process to be led by Economic Growth.	£100,000 Revenue
NSDC Business Advice Service Bespoke specialist advice and guidance for businesses across the district.	Extension of an existing Service Level Agreement with Nottinghamshire County Council.	£25,000 Revenue
LUF 3 Sherwood Capital Programme Contribution towards the Clipstone/Ollerton Town Centre regeneration scheme, addressing known match funding requirements, subject to a separate report to Cabinet relating to the projects.	Direct delivery, led by Economic Growth and Regeneration.	£912,487 Capital
Alternative Education & Skills Development Project Following pilot in 24/25, the provision of a bespoke skills development scheme, supporting targeted communities that are disengaged, or unable to access mainstream AEB or UKSPF funded skills provision, through bespoke learning and engagement solutions.	Direct delivery, led by Community Development.	£50,000 Revenue
Community Tree Nursery Scheme Dedicated resources to coordinate the district wide tree planting, community volunteering and educational/environmental programme, through the tree nursery known as 'Sherwood Seedbank'.	Grant award to the Sherwood Forest Trust Charity.	£40,000 Revenue
Re-New' Project Educational opportunities and adult learning courses for eligible economically inactive residents across the district, such as ESOL, Maths, English, IT, and creative activities.	Grant award to Inspire, Culture and Learning.	£49,000 Revenue
'Grow' Project Traditional employment support for eligible economically inactive residents across the district including jobs searching, CV writing, interview prep, volunteering, signposting, key-worker referrals, advice and guidance.	Grant award to Framework Housing Association.	£45,000 Revenue
'Boosting' Project Employment and skills support for residents in employment, including access to bespoke training solutions and courses to help employees progress within the workplace.	Grant award to Lincoln College Group.	£50,000 Revenue
'Golden Thread' Project Continued delivery of the youth volunteering project, working with local schools and community groups to support young people at risk of, or considered NEET, to access volunteering.	Grant award to Newark and Sherwood CVS	£20,000 Revenue

Appendix B - REPF Interventions (Government approved list)

Intervention	Example projects
Capital funding for small scale investment in enterprises in rural areas, growing the local social economy and supporting innovation	<ul style="list-style-type: none"> • Creation and expansion of rural leisure and tourism businesses e.g. creating event venues or farm tourism facilities or providing facilities for pet and equines. • Funding for resilience infrastructure and nature-based solutions that protect local businesses and community areas from flooding. • Creating multifunctional rural business hubs providing shared workspace and networking opportunities for rural businesses. • Purchase of equipment for food processing for non-farmer-owned businesses.
Capital funding for capacity building and infrastructure support for local civil society and community groups	<ul style="list-style-type: none"> • Providing net zero infrastructure for rural communities to support rural tourism activity e.g. EV charging points or community energy schemes. • Supporting kitchens in community hubs to help food and drink entrepreneurs get accreditation for food production.
Capital funding for cultural, heritage and/or tourism assets where it will benefit the rural visitor economy	<ul style="list-style-type: none"> • Developing local visitor trails and infrastructure such as tourism boards, visitor centres, visitor experiences and general tourist attractions. • Improving accessibility at heritage and culture sites.
Capital funding for creation and improvements to local rural green spaces including active travel enhancements	<ul style="list-style-type: none"> • Upgrading cycle and footpath links. • Creating or improving community gardens, green spaces, watercourses, embankments, greening of streets and paths.
Capital grant funding for rural circular economy projects	<ul style="list-style-type: none"> • Setting up or enhancing rural community-led repair cafés or mend workshops.
Capital funding for community assets where it will result in impactful volunteering and/or develop social and human capital in rural places	<ul style="list-style-type: none"> • Undertaking physical improvements to volunteering and community premises including the provision of digital infrastructure for community use. • Purchasing large equipment to enable the delivery of volunteering and/or social action projects.



Report to: Cabinet Meeting: 10 June 2025

Portfolio Holders: Councillor Claire Penny - Sustainable Economic Development
Councillor Paul Peacock - Strategy, Performance & Finance

Director Leads: Matt Lamb, Director - Planning & Growth
Sanjiv Kohli, Director - Resources

Lead Officers: Neil Cuttell, Business Manager - Economic Growth & Visitor Economy, Ext. 5853
Sarah Husselbee, Programmes Manager, Ext. 5802

Report Summary	
Type of Report	Open Report / Key Decision
Report Title	Plan for Neighbourhoods Update
Purpose of Report	To provide an update on the announcement of the Plan for Neighbourhoods scheme, and next steps to programme delivery.
Recommendations	<p>It is recommended that Cabinet:</p> <ul style="list-style-type: none"> a) note the contents of the report, including the announcement of the Plan for Neighbourhoods programme, and the award of up to £19.5m to Newark over a 10-year period, in accordance with paragraph 1.2 of the report, subject to the development of a Local Regeneration Plan, and subsequent Government approvals; b) approve the addition of a £200,000 revenue budget in 25-26 funded by programme capacity grant, to be allocated by Newark Town Executive Board, in accordance with paragraph 1.10 of the report; and c) note that a future update report will be presented to Cabinet regarding local programme plans, prior to submission of the Regeneration Plan in 2025, in accordance with paragraph 1.11 of the report.
Alternative Options Considered	There is an option to choose to inform Government that Newark does not wish to retain the offer of the Plan for Neighbourhoods Programme. This option has been discounted as the resource would achieve shared goals identified by the Community Plan and the Newark Town Board.

Reason for Recommendations	The recommendations are provided on the basis of the next steps in the delivery of the Plan for Neighbourhoods Programme with Newark Town Board. The opportunity provided through this programme will assist in achieving shared objectives over the next 10 years for Newark.
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1.0 **Background Information**

- 1.1 On 4 March 2025, the UK Government published details of the 'Plan for Neighbourhoods' (PfN) scheme, as a £1.5 billion programme to invest in 75 areas over the next decade. The announcement of this programme follows the former, proposed Long-Term Plans for Towns (LTPT) initiative. The metrics used for selection included indices of multiple deprivation, population size, healthy life expectancy, Gross Value Added per hour worked and local skills levels.
- 1.2 The commitment of up to £19.5m over a 10-year period, will now continue to be available to Newark through the PfN programme, with the focus of the fund surrounding three core objectives of 'thriving places; stronger communities; and taking back control'. The list of all eligible places remains unchanged from that determined through the previous LTPT scheme; however, the new programme offers a revised fixed funding profile, with core delivery funding now set to commence in April 2026. Details of the new funding profile, set out through the PfN scheme, are available in **Appendix A** of this report.
- 1.3 The PfN scheme provides the opportunity for places to invest in a choice of over 40 different pre-approved interventions, set out by the Ministry for Housing, Communities and Local Government (MHCLG). Each intervention sits within one of 8 core programme themes, as listed below, building on from the previous capabilities of LTPT.
 - Regeneration and High Streets
 - Housing
 - Work, productivity and skills
 - Education and opportunity
 - Health and Wellbeing
 - Cohesion
 - Transport
 - Safety and Security
- 1.4 The PfN prospectus now refers to Town Boards as 'Neighbourhood Boards' for the purpose of governing the delivery of the local PfN scheme, responsible for creating a local Regeneration Plan for submission to Government for approval, by Winter 2025. The programme continues to operate with a community led focus, with Neighbourhood Boards required to work in partnership with the Local Authority to develop the plan for their area and distribute funding to the projects to deliver on local vision.
- 1.5 The local Regeneration Plan should outline the areas overarching vision for change over the next decade to deliver the strategic objectives of the programme, developed through engagement to reflect local priorities. As part of the 10-year Regeneration Plan, Boards will need to provide a more detailed Investment Plan for the first 4-year investment period cycle (2026/27 to 2029/30), which will include details of interventions the board would like to pursue over the period.

- 1.6 In addition to facilitating the development of a place's plan, while recognising the role of the Neighbourhood Board as the decision-making forum, the Council will act as the Accountable Body for the funds. This includes responsibility for ensuring that public funds are distributed fairly and effectively, and that funds have been managed in line with the [Nolan Principles](#) and [Managing Public Money](#) principles. The Programme also requires the council to ensure appropriate contract and performance management, claim assessment and monitoring and evaluation of individual projects within the programme.
- 1.7 Shortly after the announcement of PfN, all places were notified of a requirement to submit confirmation of local governance and geographical boundary arrangements to Government by no later than 22nd April 2025. This included details of Neighbourhood Board Membership, confirmation of the Board Chair(s), and supplementary governance documents. This information was submitted to Government within the required timescales, and the Council awaits confirmation of suitable local processes, from MHCLG.
- 1.8 Due to the interdependencies between the PfN scheme, Towns Deal and former LTPT, the Newark Town Executive Board will act as the 'Neighbourhood Board' for the purpose of the PfN scheme. At a recent meeting of the Newark Town Executive Board Meeting held on 9th April 2025, both the Neighbourhood geographical boundary and local governance arrangements were approved for the purpose of PfN, enabling prompt confirmation of arrangements to Government. This includes the continued adoption of the existing Newark Town Executive Board Membership and Chair arrangements as well as confirmation of the proposed geographical boundary, as demonstrated in **Appendix B** of this report. In accordance with process set out within the scheme's prospectus, the local MP was consulted at the time and endorsed both the boundary and governance arrangements.
- 1.9 At the time of writing, local arrangements are under review by Government and will be formally implemented following confirmation of suitable and robust governance processes. To ensure the operations of Newark Town Executive Board remain aligned to the PfN prospectus, in addition to the existing Towns Deal, the Council is undertaking a review of the Newark Town Executive Board Assurance Framework, to be presented to the Board for future approval, in addition to approval from the Accountable Body.
- 1.10 To facilitate the development of local plans, and support the costs associated with scheme delivery, £200,000 revenue capacity funding was announced for PfN in 25/26, and a further £150,000 revenue capacity funding is expected to follow in 26/27. The first £200,000 is to be received by each Local Authority in the coming weeks, and once the local governance and boundary arrangements are confirmed by MHCLG. It remains the responsibility of the Neighbourhood Board to decide the most appropriate uses of future capacity funding, depending on local context and planning. Example uses will include resourcing, capacity, marketing, business case development, communications, engagement and feasibility to support local strategy/project development. To facilitate flexible and responsive formation of plans, the revenue budget of £200,000 capacity funding is required to be established in 25/26, as set out above.

- 1.11 The Newark Town Executive Board will continue to engage with a range of key stakeholders and the community to identify local priorities for the Town. This aligns to the requirements set out within the PfN prospectus, focussing on a community-oriented approach to Board investment decisions. It is expected that the local Regeneration Plan will be submitted Winter 2025, following agreement of plans by the Newark Town Executive Board, and a future report to Cabinet, detailing local proposals, and to seek approval for the establishment of programme budgets from April 2026 onwards, funded by grant.
- 1.12 It should be noted that the focus of the local Plan is expected to surround interventions, and objectives, rather than identifying fully defined projects for delivery through the scheme, with full details yet to be published by Government. It is anticipated that the project selection process will finalise following submission of plans in Winter 2025, with alignment to the objectives and priorities agreed within the future local Regeneration Plan.

2.0 Implications

- 2.1 In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate.

Financial Implications (FIN25-26/4144)

- 2.2 Appendix A outlines the anticipated grant over a 10-year period starting from 2025/26. This grant has not yet been included in the Medium-Term Financial Plan. However, with the Government's recent publication of the 'Plan for Neighbourhoods' (PfN) confirming £19.537 million (previously committed under the Long-Term Plans for Towns (LTPT) initiative) a budget in 2025/26 can now be allocated from that expected Capacity Funding in this financial year for the costs described in paragraph 1.10.
- 2.3 Regarding future funding expectations, the income and expenditure for the Revenue element can be included in the Medium-Term Financial Plan (MTFP) during the budget process for 2026/27 to 2029/30, as outlined in paragraph 1.5.
- 2.4 Regarding the Capital element of the grant, once local proposals are agreed upon by the Newark Town Executive Board and reported to the Cabinet, consideration can be given to adding the associated budgets to the Capital Programme. If any of the proposed projects belong to NSDC, full financial implications will be provided.

Legal Implications (LEG2526/270)

- 2.5 Cabinet is the appropriate body to consider the content of this report.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

Levelling Up White Paper, 2022

Levelling Up Fund Prospectus and Guidance, 2022

[Plan for Neighbourhoods: governance and boundary guidance - GOV.UK](#)

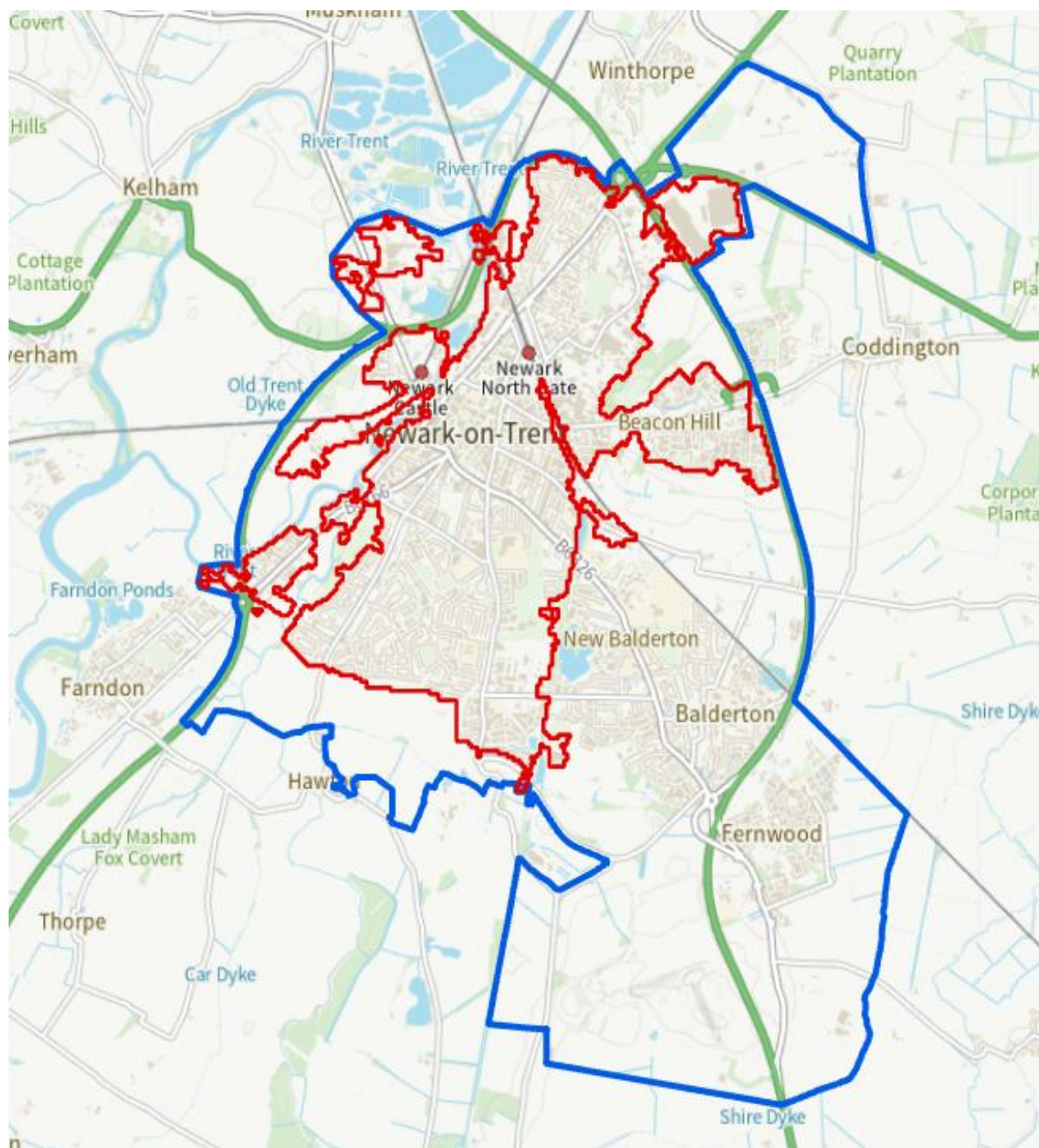
Appendix A – Plan for Neighbourhoods Funding Profile (set by Government)

Each community will receive funding and support, totalling up to £20 million. The funding will be split 75% capital and 25% revenue, to the following profile:

Grant type	2025 to 2026	2026 to 2027	2027 to 2028	2028 to 2029	2029 to 2030	2030 to 2031	2031 to 2032	2032 to 2033	2033 to 2034	2034 to 2035	2035 to 2036
Total revenue funding	200k	382k	256k	432k	432k	432k	432k	437k	450k	450k	450k
Revenue funding (capacity)	200k	150k	-	-	-	-	-	-	-	-	-
Revenue funding (grants)	-	232k	256k	432k	432k	432k	432k	437k	450k	450k	450k
Capital funding (grants)	-	360k	1.7m	1.6m	1.6m	1.6m	1.6m	1.6m	1.6m	1.6m	1.6m
Total	19,537										

More information available [here](#)

Appendix B – Geographical Boundary (Plan for Neighbourhoods)





Report to: Cabinet Meeting: 10 June 2025

Portfolio Holder: Councillor Claire Penny – Sustainable Economic Development

Director Lead: Matt Lamb, Director - Planning & Growth

Lead Officer: Matthew Norton - Business Manager, Planning Policy & Infrastructure, Ext. 5852

Report Summary	
Type of Report	Open Report / Key Decision
Report Title	Solar Energy Supplementary Planning Document
Purpose of Report	To present the draft Supplementary Planning Document (SPD), which has been amended in response to comments received from consultees and also with factual updates; and to seek endorsement for its adoption.
Recommendations	That Cabinet approve: a) the Council's responses within the Consultation responses document at Appendix A to the report; and b) the adoption of the Solar Energy SPD as attached at Appendix B to the report.
Alternative Options Considered	Cabinet has already approved the production of the Solar Energy SPD therefore no alternative options have been considered.
Reason for Recommendations	To allow the District Council to adopt the Solar Energy SPD.

1.0 Background

- 1.1 In 2024, Members asked Officers to create a Supplementary Planning Document (SPD) addressing issues around major solar energy developments. A draft version of this SPD was taken to Planning Policy Board on 22 May 2024. Amendments were made in the light of comments made by Members, and this version of the draft SPD was taken to Planning Policy Board on 8 July 2024. Members endorsed the document's progress to Cabinet.
- 1.2 On 23 July 2024, Cabinet gave authorisation for the draft SPD and supporting documents to be placed on public deposit for a minimum six-week consultation period. The consultation began on 30 July 2024 and ran for eight weeks because of the summer holiday period. Following the close of the consultation on 24 September 2024, responses were reviewed and consequent amendments to the draft SPD were proposed. Other amendments that were factual updates were also proposed. These amendments were

endorsed by Planning Policy Board on 26 March 2025, and endorsement was also given to take the SPD to Cabinet for adoption.

- 1.3 Comments received and the actions taken can be seen in the Consultation Responses Document attached as **Appendix A**. The amended SPD itself is attached as **Appendix B** with proposed new text underlined and material that it is proposed to remove crossed through. Officers have also begun work on having a Landscape Sensitivity Study carried out which will support the SPD and inform decision making.

2.0 Proposal

- 2.1 It is proposed that Cabinet approves the adoption of the Solar Energy SPD and the Council's responses within the Consultation Responses Document. The Consultation Responses Document will be included in a formal Statement of Consultation published alongside the adopted SPD.

3.0 Implications

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate

Financial Implications – FIN25 – 26/9189

- 3.1 No direct financial implications have been identified.

Legal Implications – LEG2526-1092

- 3.2 Planning documents that form part of the Council's Policy Framework are reserved to Full Council for approval; Cabinet is the appropriate body to approve this supplementary planning document which does not form part of the Policy Framework.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

The 23 July Cabinet report is published - <https://democracy.newark-sherwooddc.gov.uk/ieListDocuments.aspx?CId=288&MIId=1010>

APPENDIX A

Newark and Sherwood District Council Draft Solar Energy Supplementary Planning Document Consultation Responses Document

Responses have been edited and summarised for clarity and concision, and proposed amendments are suggested.

It is also proposed to update the draft SPD to take account of factual changes including changes to national planning policy and guidance, and the progress of the District Council's Local Plan Review.

District Council Officers are currently preparing a Request for Quotation for consultants to undertake the Landscape Sensitivity Study.

Respondent ID / Organisation	Summary of Comment	Response / Action
001 - National Highways	<p>The Draft Solar Energy SPD aims to provide clear guidance on the application and interpretation of local and national policies related to major stand-alone ground-mounted solar photovoltaic (PV) developments in the Newark and Sherwood District.</p> <p>We are broadly supportive of the Draft Solar Energy SPD and believe it serves as a valuable tool for guiding developers on key transport considerations essential for constructing and operating solar farms. Additionally, it provides important information on the NSIP process (for solar farms exceeding 50 megawatts) and the EIA screening process (as outlined in Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017).</p> <p>Regarding solar farms adjacent to our network and National Highways considerations, please refer to paragraph 70 of the Circular:</p> <p>Some developments, notably solar farms, wind turbines and those with expansive glass facades, have the potential to create glint and glare which can be a distraction for drivers. Where these developments would be visible from the SRN, promoters must provide an appropriate assessment of the intensity of solar reflection likely to be produced, which satisfies the company that safety on the SRN is not compromised.</p>	<p>These comments are welcomed.</p> <p>It is proposed to add the following sentence to para 6.36:</p> <p>'Where solar farms would be visible from the Strategic Road Network (SRN), developers must provide an appropriate assessment of the intensity of solar reflection likely to be produced, which demonstrates that safety on the SRN is not compromised.'</p> <p>Change 'Strategic Road Network (SRN)' in para 6.54 to just 'SRN'</p> <p>Define Strategic Road Network in the glossary.</p>

<p>002 - Richard Barnard, Resident of Laugherton</p>	<p>Question 3:</p> <p>Our village is located just to the north of the area for consideration around North Clifton / Thorney. We also have projects under consideration within 5 miles to the north (Gate Burton). Then the West Burton Project approximately 3m miles to the east extending over 10 miles, the Cotham project approximately 8 miles northeast and 5 miles to the West the Sturton Le Steeple solar project .</p> <p>Whilst our village bounders Newark & Sherwood to the west and to the south, we ask that you take into consideration that if all projects are approved then there's the possibility that we could be surrounded by approximately 13,000 acres of solar panels. Whilst I appreciate it is a national significant project I feel that the intensity to our area is excessive.</p> <p>Question 5:</p> <p>Proposed Battery storage at West Burton, & Cottam is 600 megawatts each. I see that phase 1 of the High Marnham project is around 50Mw. So 600 x 40' containers & West Burton, 600 x 40' containers at Cottam & 50 x 40' containers at High Marnham. What testing / risk assessment has been carried out should there be an event of fire with such a large volume of battery storage?</p> <p>https://www.ctif.org/news/solar-farm-lithium-ion-battery-fire-took-four-days-extinguish.</p> <p>This was a very small project in comparison. How many miles radius will have to be evacuated? Where will everyone be evacuated to? How long will it be before people can return to their homes and businesses?</p> <p>During a battery fire, over 100 organic chemicals are generated, including some incredibly toxic gases such as carbon monoxide and hydrogen cyanide – both of which are fatal to humans.</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p> <p>See comments from Respondent 010, the Environment Agency (below) concerning Battery Energy Storage Systems.</p>
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<p>003 - Nottinghamshire Fire and Rescue Service</p>	<p>Section 6.50</p> <p>Reading this section it implies that only the following need to be considered.</p> <p>"siting and location of BESS, prevention of the impact of thermal runaway, and emergency services access, can be considered before an application is made".</p> <p>Having worked closely with your team to date there is more to it than just the above.</p>	<p>These comments are welcomed.</p> <p>A It is proposed to amend the last sentence of para 6.50 to read:</p> <p>'This is so matters relating to operational safety can be fully considered before an application is made, including the siting and location of BESS within the development site, the prevention of the impact of thermal runaway, and emergency services access.'</p> <p>Reference will also be added to a new appendix on BESS to be included in response to comments from Respondent 010, the Environment Agency (see below).</p> <p>Para 6.50 erroneously contains the words 'thermal runaway'; this should be corrected to read: 'thermal runaway'.</p>
<p>004 - Carlton on Trent Parish Council</p>	<p>Solar developments should be on brown fields and roofs leaving agricultural land for food, local resources should be used wherever possible, flood mitigation should be a foremost consideration for developers and any planning response, there should be minimal impact in a conservation area and the views of residents should be taken into account.</p>	<p>Paragraph 3.14 refers to advice from 'Powering Up Britain: Energy Security Plan', and paragraph 6.42 refers to advice from EN-3. These documents guide solar farm development to areas less valuable for food production such as 'brownfield, industrial and low and medium grade agricultural land', or 'previously developed land, brownfield land, contaminated land and industrial land'. It should be recognised, however, that due to the largely rural nature of Newark and Sherwood District it is likely that a major solar development will use agricultural land.</p> <p>Flood mitigation is an important material consideration and is addressed in paragraphs 6.30 and 6.31.</p>

		<p>Impacts on the historic environment and heritage assets are addressed in Chapter 6, and it is agreed that impacts on conservation areas should be minimised.</p> <p>Local residents will be consulted on any solar farm application decided by the District Council, and residents' interests will be considered when preparing Local Impact Reports in response to NSIP applications.</p>
005 - North Muskham Parish Council	<p>Question 2:</p> <p>The Parish Council suggests that it is important that reference here is also made to the Environment Act 2001 and the strategy document: "A green future- Our 25 year environmental plan to improve the environment</p> <p>Question 4:</p> <p>The Parish Council suggests it is important to include impacts on the psychological and physical health of residents in affected communities and the how the proposals have a cumulative effect and impact in the district. Cumulative should include wind farms as well as solar.</p>	<p>The Environment Act 2021 is discussed and a link to it is provided in paragraph 6.10. 'A Green Future: Our 25 Year Plan to Improve the Environment' is discussed and a link to it is provided in paragraph 6.12. It is not considered necessary to refer to these documents elsewhere.</p> <p>Potential psychological and physical health impacts of solar farm developments that fall within the remit of this SPD are covered by Chapter 6, with the following sections most likely to be relevant: Landscape and Visual Impacts, Biodiversity, Habitats and Green Infrastructure, Flooding and Drainage, Cumulative Impacts, Glint and Glare, Community Consultation and Benefits, Residential Amenity, and Public Rights of Way.</p> <p>It is acknowledged that the assessment of cumulative impacts from solar farms may need to take account of other forms of development.</p>

	<p>In preparing the Local Impact Report, the Parish Council suggests it is important to at least ask Parish Councils of their views of the impacts on their communities, as they often have an understanding of local issues and opportunities unknown to higher tier councils.</p> <p>The LIR process should be transparent and approved by elected members and subject to scrutiny.</p> <p>Question 6:</p> <p>It should be acknowledged that any screening mitigation will not be effective until after several years of maturity of the trees and hedgerows. (How will the stated mitigation in an application be enforced post development, ie: what happens if the hedgerow or tree fails and dies?)</p> <p>A key consideration is the landscape character assessment- this should be emphasised</p> <p>6.10: "Solar farms often have the potential to contribute to a significantly greater BNG without jeopardising the viability of the project"- please add an explanation of how and why?</p> <p>6.13: LNRS- this should be included in chapter 4- also- "Local Policy"</p>	<p>Local Impact Reports (LIRs) are not consultation documents but assessments of likely effects upon a LPA's area. If stakeholders, including Parish Councils, make comments identifying relevant impacts, these can be included in LIRs where appropriate. Parish Council comments that are not suitable to be included in LIRs can still be passed on to interested parties. LIRs must be approved by Planning Committee before they can be submitted.</p> <p>Screening requirements will be assessed for each major solar farm application and will differ in each case. Long term maintenance of screening and other mitigation measures can be required by condition as part of a planning consent. The Landscape Character Assessment identifies Landscape Policy Zones (LPZs) and Chapter 8 sets out that new development must make a positive contribution to the relevant zone(s).</p> <p>On-site biodiversity enhancements will build upon the existing site features and will be different for each application. While it is not considered appropriate for the SPD to suggest how particular levels of BNG could be provided, major solar farms can sometimes deliver more than 10% for reasons including their large scale and long-term nature, and the potential for enhanced connectivity.</p> <p>The 'Local Policy' chapter concerns District Council policies only, and the LNRS will be guidance applicable to all participating Local Authorities.</p>
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	<p>Green Belt- Chapter 13 of the NPPF should be included also in chapter 3- "National Policy and Guidance.</p> <p>Parish Council's should be consulted when achieving the Landscape Character Assessment</p> <p>6.56- How will this be enforced post development?</p> <p>Question 8:</p> <p>There is surprisingly no mention of Parish Councils within the document, especially given that the solar park proposals will effect largely the rural areas to which they have a democratic mandate to represent their communities.</p> <p>As statutory consultees they should at least be acknowledged that they have a part to play and the Planning Authority should provide guidance to them regarding the NSIP solar project application process and encourage them to participate in the process. Suffolk County Council have compiled a guidance document for their parish councils- please consider this for NSDC area given the grid connection attractions in the area for solar developers</p>	<p>The discussion of issues relating to the Green Belt in Chapter 6 is considered to be sufficient.</p> <p>Parish Councils were consulted during the production of the Landscape Character Assessment.</p> <p>6.56: This paragraph concerns the construction phase of solar farms, so post development enforcement is not relevant.</p> <p>Reference to community consultation, including with Parish Councils, will be added to paragraph 10.2.</p>
006 - Natural England	<p>Question 4:</p> <p>Natural England generally welcomes the section on Biodiversity, Habitats and Green Infrastructure including the reference to the nature conservation designations at 6.6 and the reference to Natural England's Green Infrastructure Framework at 6.11. We are also pleased to note that the jointly prepared statement "A Biodiversity Net Gain Framework for Nottinghamshire and Nottingham' has been referenced. At 6.10 we welcome the aspiration for solar farms to achieve greater than 10% Biodiversity Net Gain.</p>	<p>These comments are welcomed.</p> <p>No actions are proposed.</p>

	<p>At 6.13 we are pleased to note that the Nottinghamshire Local Nature Recovery Strategy (LNRS) has been included.</p> <p>Natural England welcomes the paragraphs on the protection of Best & Most Versatile land and the aim to encourage the use land for agricultural purposes at the same time as solar power generation where appropriate however land of lesser environmental value should be preferred to BMV land.</p> <p>Question 5:</p> <p>Natural England welcomes this chapter, particularly the protection of the Birklands & Bilhaugh Special Area of Conservation (SAC) and the Sherwood National Nature Reserve. We are also pleased to note the inclusion of information on the Sherwood possible potential Special Protection Area (ppSPA).</p> <p>Question 6:</p> <p>Natural England generally welcome this chapter and the reference to the Newark & Sherwood Landscape Character Assessment.</p>	
007 - The Coal Authority	<p>We note that these current consultations relate to issues of Affordable Housing and Solar Energy SPDs. I can confirm that the Planning team at the Coal Authority have no specific comments to make on these SPD documents.</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>
008 - N.M.Dessurne Resident of Balderton	<p>I have been sent a letter seeking my views, as a local resident and landowner, on the Draft Solar Energy SPD.</p> <p>The comments relate to question 7 on the form: Environment Impact Assessment.</p> <p>Generally speaking, the idea behind solar panels is to mitigate the supposed consequences of climate change, namely; rising sea levels and inland river levels. With respect to these parameters, it is important that the solar developments, themselves, do not add to this problem. Newark, the town, has a serious issue with flooding as it is, with ever more water running into the river Trent, particularly</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>

	<p>from development. This is because land that is developed can no longer absorb water, so the total rainfall ends up in the river. The same applies to solar developments on farmland (not roof tops, which is entirely different).</p> <p>If farmland has not got a crop growing on it throughout the year, the water increase into the river every year is equal to the water that has not been used by the crop. This quantity is estimated to be between 30 and 50 percent of the annual rainfall according to most assessments, and the annual rainfall in the Newark area is normally around 24 inches. 1 inch of rain per acre is equal to 100 tons of water, therefore in 1 year over an area of 10,000 acres the total amount of water is 24 million tons. Even if only 30 percent of this finishes up in the river, it is equal to 7.2 million tons or 7.2 million cubic metres.</p> <p>Under the circumstances, I think that large solar developments in the Newark area is asking for trouble.</p>	
009 - The Canal & River Trust	<p>We note the recognition that appropriate screening could address visual impacts on those using the river corridor. However, there may be other mitigation that could address these impacts. For example, through siting, design or layout. Therefore, we request that the text be amended as follows:</p> <p>6.5 Solar farms can cover a significant surface area so the selection of suitable sites and the use of appropriate <u>mitigation measures, including</u> screening such as hedgerows are important to ensure that the area of a zone of visual influence can be minimised. Associated infrastructure such as substations or battery energy storage systems should be located within the development site to minimise landscape and visual impacts.</p> <p>Glint and glare have the potential to affect safe navigation along the river by boaters. Therefore, we request that the text be amended as follows:</p>	<p>These comments are welcomed.</p> <p>Apart from changes to Appendix 1 (see below), it is proposed to make all the suggested amendments, with the wording for 6.52 being slightly altered so that it reads better.</p>

	<p>6.36 Applicants should identify potential receptors to assess possible glint and glare issues and determine if a glint and glare assessment is necessary. When such an assessment is necessary, applicants are expected to consider how glint and glare could affect receptors and provide an assessment of potential impacts including the duration of the effect and the intensity of the reflection. It may be necessary to consider impacts on aviation <u>and river navigation.</u></p> <p>6.48 /6.49 Text should be amended acknowledging that impacts in sensitive areas could be mitigated through undergrounding cable connections.</p> <p>6.50 Text should be amended acknowledging that visual and other impacts can arise from BESS proposals that may require mitigation. Text should be amended to recognise that security measures should be appropriately designed, or impacts mitigated. Suggested text is provided below:</p> <p>6.52 Planning applications for solar farms should include details of all site security measures such as perimeter fencing, CCTV cameras and lighting. It is recognised that such measures will usually be necessary. Consideration should be given to potential impacts including those upon habitats and biodiversity, landscape, heritage assets, public rights of way and residential amenity. How potential impacts might vary according to the time of day or the season of the year should be taken into account. Security measures, in particular fencing and lighting, should not be excessive and may require justification. <u>They will need to appropriately designed or adverse visual impacts mitigated through other means.</u></p> <p>6.60 We note that the most part the paths alongside the river navigation are PROWs.</p> <p>8.5 We note that the Landscape Sensitivity Study has not been provided so we are unable to comment on it.</p>	<p>Appendix 1 reproduces Building Research Establishment advice verbatim. Altering it in</p>
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	<p>Appendix 1: The list of information to be included within a LVIA should also include cross sections/planting plans etc, including as part of the non-technical summary.</p>	<p>any way would make it direct advice from Newark and Sherwood District Council and this is not intended. It is not, therefore, considered appropriate to alter Appendix 1.</p>
010 - Environment Agency	<p>We are pleased to note that the key points and references to relevant legislation have been included within the draft document. Therefore, our comments are not extensive in nature however we have highlighted some minor points and observations which are listed below.</p> <p>Section 6.6 – while SACs, SSSIs and LWSs do not fall under the direct remit of the Environment Agency we are pleased that these have been highlighted and recognised as requiring protection as key areas for nature conservation.</p> <p>Sections 6.7 and 6.8 – We are pleased that these sections discuss the importance of incorporating new and improving existing Green infrastructure (GI) through new development. It is particularly encouraging that the GI sections also make reference to the important role that bodies of water such as rivers (Blue Infrastructure) play in developing effective GI interventions.</p> <p>Section 6.10 – The inclusion of reference to the requirement for a minimum of 10% Biodiversity Net Gain (BNG) is a welcome addition to the document. We are very pleased that emphasis is placed on this being a minimum and should not be viewed as a “suggested maximum” encouraging developers to deliver in excess of 10% where possible.</p> <p>Sections 6.13, 6.14 and 6.15 – These sections highlight the future implementation of the Local Nature Recovery Strategy (LNRS) for Nottinghamshire. It is encouraging to see a large emphasis placed on this as the EA are keen to work closely with our partners on the development of the LNRS moving forward.</p> <p>Sections 6.30 and 6.31 - we agree with the content of both sections and have nothing further to add. It may be beneficial to reference</p>	<p>These comments are welcomed.</p> <p>It is proposed to add reference to Core Policy 10 to para 6.31. The comments on para 6.50 are particularly helpful and it is proposed that these are added to the SPD as a new appendix on Battery Energy Storage Systems, and that reference to this is added to para 6.50.</p>

	<p>Core Policy 10 – Climate Change for further information regarding flood risk.</p> <p><u>Section 6.50 – Battery Energy Storage Systems</u></p> <p>Section 6.50 – we have some advisory notes which we have been sending out to relevant LPAs when applications are received which you may wish to include in this document or consider for future applications which are submitted which are detailed below.</p> <p><i>Informative – General guidance for BESS developments</i></p> <p><i>In line with planning practice guidance:</i></p> <ul style="list-style-type: none"> <i>Applicants should engage with Local Fire & Rescue Services issues of siting and location of BESS are dealt with before applications are made. Ideally this should be done before submitting a planning application.</i> <i>Local planning authorities to refer to guidance produced by the National Fire Chiefs Council for consideration when determining applications and consult with local Fire & Rescue Services before issuing decisions.</i> <i>Applicants will also need to comply with relevant Building Regulations in Part B. They require applicants to provide suitable access for the fire service.</i> <p><i>Informative - Management of end of life industrial batteries</i></p> <p><i>Battery energy storage systems (BESS) facilities are not regulated under the Environmental Permitting Regulations regime.</i></p> <p><i>However, battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs.</i></p>	
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	<p><i>Batteries have the potential to cause harm to the environment if stored inappropriately e.g. subject to a fire as the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place.</i></p> <p><i>The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only.</i></p> <p><i>Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.</i></p>	
011 - South Clifton Parish Council	<p>Question 1:</p> <p>1.9 – We are pleased to see that N&SDC has committed to a study regarding major solar developments that have planning permission, have been developed or under construction; and that it will include neighbouring areas to our district, and will use this information to produce a Land Sensitivity Study. Can you confirm this will be used to assess the suitability of NSIPs in the district and their proximity to each other and other major developments? Will this information form part of the Districts’ response to the Planning Inspectorate?</p> <p>Question 2:</p> <p>We appreciate that the NPPFs’ environmental objective is to protect and enhance our natural, built and historic environment.</p> <p>3.4b recommends approving an application if its impacts are (or can be made) acceptable. How will this apply to NSIPs’ and are the local community/councils included in the process to decide what is acceptable?</p>	<p>The Landscape Sensitivity Study will take account of take account of all solar farm developments including those which are NSIPs. The advice provided will also be applicable to all solar farm developments including NSIPs. It is expected that the Landscape Sensitivity Study will inform Local Impact Reports (LIRs) produced by the District Council when commenting on NSIP proposals.</p> <p>Paragraph 3.4 quotes directly from the NPPF. The section of the NPPF quoted has been altered since the draft SPD was produced and the text referred to has been deleted. This text will therefore not be carried forward in the draft SPD.</p>

	<p>3.14 states that solar and farming can be complementary – How can this apply to NSIPs that propose to use vast areas of farming land and to fence it off to all, humans and wildlife?</p> <p>Question 3:</p> <p>We are, at present, trying to reduce the vast size and scale of the One Earth Solar Farm. As a council we are not anti-solar and had the proposal from OESF been less invasive, changing the look, feel and structure of our farmland and countryside, many would have been more supportive.</p> <p>Reading chapter 5, we cannot help but think the guidance is skewed towards the developers and that the villagers affected have little support from N&SDC. We appreciate that Chapter 5 gives a clear framework for the consideration of NSIPs by the Secretary of State, but would like to see a clear consultation and aid process between N&SDC and the small councils, meetings and villagers affected by these huge plans. The developers of the proposed NSIPs have a huge amount of funding behind them to afford the best personnel, whereas, the ‘locals’ have little experience/expertise, financial clout and the wherewithal to fight effectively. 5.10 onwards mentions ‘local authorities’ several times. Can you clarify who exactly are the local authorities?</p> <p>Question 4:</p> <p>On the whole, this chapter seems to cover most considerations effectively.</p> <p>6.31 – says a Flood Risk Assessment should demonstrate that the site will remain safe in the future, taking into account the effects of climate change. We are concerned that this assessment should take in the surrounding areas around the site too as they could be significantly impacted.</p>	<p>Paragraph 3.14 discusses ‘Powering Up Britain: Energy Security Plan’. This document states:</p> <p>‘Solar and farming can be complementary, supporting each other financially, environmental and through shared use of land. We consider that meeting energy security and climate change goals is urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK. We encourage deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.’</p> <p>This guidance is applicable to all solar farm developments including NSIPs.</p> <p>Parish Councils will be consulted directly on major solar farm applications affecting their area that are decided by Newark and Sherwood District Council. With NSIPs, the District Council will prepare a Local Impact Report (LIR) that assesses likely effects but these are not consultation documents and not a way to object to or express approval for development proposals. If stakeholders, including Parish Councils, make comments identifying relevant impacts, these can be included in LIRs where appropriate. Parish Council comments that are not suitable to be included in LIRs can still be passed on to interested parties. In the context of paragraph 5.10 onwards, the local planning authority in Newark & Sherwood District is Newark and Sherwood District Council.</p>
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	<p>6.32 – very pleased to see this included - will this include NSIP proposals too?</p> <p>6.42 – Is there any mechanism/proposal in place to crosscheck the land classification supplied by the applicant?</p> <p>6.45 – pleased to see the district councils' involvement here – again does this apply to NSIPs</p> <p>6.46 – it must be pointed out that OESF is planning on a 60-year span.</p> <p>6.47 – how can the land be assessed as having been restored to its previous condition? Is there a mechanism whereby the district council can check this? How involved would the District Council be with this assessment if the site being decommissioned is an NSIP?</p>	<p>Flood Risk Assessments will need to show that a proposed development will not increase flood risk to the surrounding areas for the duration of the operational time of the development in order for planning permission to be granted.</p> <p>NSIP proposals will be assessed in terms of cumulative impact in the same way as other solar energy developments.</p> <p>District Council Officers check land classifications using the Agricultural Land Classification Map East Midlands Region (ALC005) produced by Natural England. These maps are not sufficiently accurate for use in assessment of individual fields or sites, however, and Grade 3 agricultural land is not subdivided into 3a and 3b. More detailed survey work, including soil sampling, can be required to determine the Agricultural Land Classification of an individual site.</p> <p>The District Council seeks to secure the most generous benefits possible for communities affected by solar farm developments including NSIPs.</p> <p>The first sentence of this paragraph will be amended to read: 'Although solar farms can typically be expected to operate for up to 60 years, they are usually temporary structures and how they will be decommissioned should be considered as part of any planning application.'</p> <p>The condition of the land prior to the commencement of the development scheme, including biodiversity, will be assessed as part</p>
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	<p>6.57 – the positioning of inverters, transformers and sub-stations is a factor that really worries our parishioners. Is there an argument for stating a minimum distance in the SPD?</p> <p>Question 8:</p> <p>South Clifton Parish Council welcome this opportunity to review and comment on the Draft Solar Energy SPD.</p> <p>We are not used to reading and responding to these sorts of documents and we realise that maybe some of our comments may not apply specifically to the SPD but have come about because of our present situation. We felt it important, however, to try and be involved with this consultation and hope you will review our input favourably.</p>	<p>of any application including NSIPs. Although District Council officers would have less involvement with NSIPs than some other types of application, land restoration as part of the decommissioning process can still be ensured. A Development Consent Order (DCO) would be required to permit an NSIP, and DCOs can contain conditions that set out decommissioning requirements.</p> <p>While concerns about the location of equipment ancillary to solar farms are understood, there is no basis in national or local policy for setting a minimum distance. The imposition of an arbitrary minimum distance would be inappropriate because factors including landform and screening can mean that different separation distances are acceptable in different cases. Impacts on residential amenity will be assessed for each individual proposed development.</p>
012 - Nottinghamshire Wildlife Trust	<p>Question 2:</p> <p>The Wildlife Trusts are in favour of installing solar energy generation capacity on buildings, where it can be developed with no additional land-take and negligible negative environmental impact. If ground-mounted solar arrays are thoughtfully located and carefully designed, their negative impacts on the natural environment can be avoided. In many circumstances there is scope for high quality wildlife habitat to be created or enhanced around the solar panels. It is not, however, appropriate to develop solar energy generation capacity or its associated infrastructure directly on areas of recognized existing high wildlife value habitat, either within designated nature conservation sites or outside them, or where harm is likely to be caused to populations of vulnerable, threatened or endangered species.</p>	<p>These comments are welcomed. See below consideration of enhancement measures for skylarks.</p>

	<p>Nottinghamshire Wildlife Trust works proactively within the planning system. We are committed to engage with consultations on local plans and supplementary planning documents and we take all necessary steps to help ensure that the right policy context is in place to guide solar and other renewable developments. We are also routinely consulted by Local Planning Authorities on planning applications, including solar schemes. The key to addressing both a future powered by renewables and having communities who will welcome the necessary infrastructure is a policy framework based on having the right technologies, in the right places, deployed at the right scales.</p> <p>It is important to recognise that not all solar farms are the same. Some proposals set higher standards, deliver greater social and environmental benefits. It is, therefore, beneficial to all concerned to engage with the renewable energy sector at an early stage so that potential constraints and concerns can be discussed to ensure wildlife and sites designated for their nature conservation value are protected. We also aim to achieve the best outcomes for wildlife in terms of habitat enhancement and creation. A good example of this is NWT are to have a presence on a steering group for the Great North Solar Park. NWT responded to the preliminary consultation with Elements Green and continued to be in dialogue with them about some elements of the design following the submission of the initial Environmental Impact Assessment (EIA) scoping report. As a result of engagement, we have influenced plans for the area to try and achieve the best outcomes for wildlife. We are also actively engaging with proponents of the One Earth Solar Farm, Tillbridge Solar Project and Gate Burton Energy Park.</p> <p>It is stated in paragraph 6.42 'EN-3 advises that while land type should not be a predominating factor in determining the suitability of the site location for solar farms regarded as NSIPs, applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land.' There are examples of previously developed land that has developed significant wildlife value that is cherished by local communities.</p>	
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	<p>Such sites are threatened by redevelopment (due to their common status as brownfield sites), inappropriate 'restoration', inappropriate management or natural succession. It is for this reason there should not be a presumption to develop brownfield sites and a proper assessment of their wildlife value and status is necessary.</p> <p>The following information is available on the Government website: Verified sites of Open Mosaic Habitat. Open mosaic habitats can be extremely diverse, including such wide-ranging sites as railway sidings, quarries, former industrial works, slag heap, bings and brick pits. Brownfields with open mosaic habitats show evidence of previous disturbance, either through soil being removed or severely modified by previous use, or the addition of materials such as industrial spoil, with spatial variation developing across the site. The resultant variation allows for a mosaic of different habitats to be supported in close proximity. This habitat diversity can support rich assemblages of invertebrates, which has led to 'open mosaic habitats on previously developed land' being added to the UK Biodiversity Action Plan (UK BAP) as a Priority habitat listed on Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act). Full metadata can be viewed on data.gov.uk. More information about the Open Mosaic Habitat inventory can be found on the Buglife website. Open Mosaic Habitat (Draft) - data.gov.uk</p> <p>Question 4:</p> <p>Many species of plants and animals in England, and often their supporting features and habitats are protected. The law varies from species to species. Harm or disturbance to protected species and their habitats should be avoided. Mitigate for the effect on them if it's not possible to avoid harm and compensate for harm as a last resort. A licence may need to be applied for to allow activities that would otherwise be illegal. Changes brought in by the Environment Act 2021 mean that a mitigation licence for animals and plants listed in schedule 5 and schedule 8 of the Wildlife and Countryside Act 1981 is required. Protected species licensing requirements are in addition to the requirements for planning permission. Licences are</p>	
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	<p>subject to separate processes and specific policy and legal tests. Some species are designated and protected as European protected species (EPS). EPS get full protection under The Conservation of Species and Habitats Regulations 2017. It's an offence to deliberately capture, injure or kill, or deliberately disturb EPS. Examples include bats, dormice, otters and great crested newts.</p> <p>Section 6.47 states: Any application to develop a solar farm should be supported by information about how the project will be decommissioned and how the land used will be, at a minimum, restored to its previous condition. Any landscape improvements, biodiversity enhancements and community benefits should be retained.</p> <p>We support the approach to retain biodiversity enhancements to ensure that established wildlife habitats are retained but we request clarification on how that will apply to in-field habitat enhancement for skylark. For example, where skylark plots were created within farmed land that was under the applicant's control during the lifetime of the solar scheme.</p>	<p>Where enhancement measures for skylarks are required to mitigate the effects of developing land that was previously agricultural, these measures will no longer be required when the land is restored to its original condition. It is proposed to amend the second sentence of paragraph 6.47 to read: 'Any landscape improvements, biodiversity enhancements and community benefits should be retained if appropriate'.</p>
013 - The Ministry of Defence	<p>I write to confirm the statutory safeguarding position of the Ministry of Defence (MOD) in relation to the Newark & Sherwood District Council Draft Solar Energy Supplementary Planning Document (SPD) for public consultation. The Draft Solar Energy SPD provides guidance on the application and interpretation of local and national policy on major stand-alone ground mounted solar photovoltaic (PV) developments in the District, with special consideration given to protected local features. As an SPD, the document provides guidance on policies but does not develop new ones.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in</p>	<p>These comments are welcomed.</p> <p>It is proposed that a new section is added at the end of Chapter 6: Material Considerations called 'Ministry of Defence interests'. This will include all the material the MoD request to be added and some of the information that they provide, ensuring that all their concerns are addressed. It is also proposed that this new section is cross-referenced in the 'Biodiversity, Habitats and Green Infrastructure' section of Chapter 6.</p>

	<p>conjunction with any other submissions that might be provided by other MOD sites or departments.</p> <p>Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Ministry of Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.</p> <p>The area covered by any Newark & Sherwood District Council Draft Solar Energy SPD will both contain and be washed over by statutory safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Waddington, RAF Barkston Heath, RAF Syerston, RAF Cranwell, and Eastern 1 WAM (Wide Area Multilateration) Network.</p> <p>Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address</p> <p>The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.</p>	
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	<p>To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.</p> <ul style="list-style-type: none"> • The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD consultation. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the change of use of land to allow/facilitate flying activities; and the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern. • Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes and marked on safeguarding maps with a heavy dotted line. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. Within these zones development that has the potential to provide an attractant environment to certain large and/or flocking bird species hazardous to aviation safety may be subject to design requirements or for management plans to be applied. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and MOD consulted where any element falls within the marked statutory safeguarding zone. 	
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	<ul style="list-style-type: none"> • Finally, those technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example in the case of a wind turbine or a solar PV system mounted on a roof. <p>Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to</p> <ul style="list-style-type: none"> o Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers. o Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m; 	
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	<p>o Any development, including changes of use and regardless of height, outside MOD safeguarding zones but in the vicinity of military training estate or MOD property.</p> <p>The MOD welcomes that the draft guidance within Pg.12 Local Policy: Policy DM4 – Renewable and Low Carbon Energy Generation: Section 4.4 have identified that planning permission will be granted for renewable and low carbon energy generation development, as both standalone projects and part of other development, its associated infrastructure (including battery storage) and the retrofitting of existing development, where its benefits are not outweighed by detrimental impact from the operation and maintenance of the development and through the installation process upon: 7. Aviation interests of local or national importance.</p> <p>Additionally, the MOD welcomes the provisions of Pg 21: Material Considerations: Glint and glare and additional context at paragraph 6.36: “Applicants should identify potential receptors to assess possible glint and glare issues and determine if a glint and glare assessment is necessary. When such an assessment is necessary, applicants are expected to consider how glint and glare could affect receptors and provide an assessment of potential impacts including the duration of the effect and the intensity of the reflection. It may be necessary to consider impacts on aviation.”</p> <p>The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations.</p> <p>The MOD request that the wording of the draft guidance is broadened to inform developers that only those applications for development which would not compromise, restrict or otherwise</p>	
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	<p>degrade the operational capability of safeguarded MOD sites and/or assets will be supported.</p> <p>The proposed draft guidance: Material Considerations: Green Infrastructure home at paragraph 6.10: “Applicants Green and Blue Infrastructure and Nature Recovery identifies that “Under the Environment Act 2021, all major projects granted planning permission in England, including solar farms, must deliver at least 10% biodiversity net gain (BNG). BNG means managing land through development in a way that leaves the natural environment in a measurably better state than it was beforehand. It is intended to ensure that through enhancing habitats, developments increase biodiversity and create new green spaces for local communities to enjoy. It should be noted that 10% is a minimum, but not a suggested maximum, and projects delivering a higher percentage of BNG are welcomed. Solar farms often have the potential to contribute a significantly greater BNG without jeopardising the viability of the project, and this will be sought by the District Council where possible.”</p> <p>The MOD request that; when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain; Newark & Sherwood District Council bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety.</p> <p>Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.</p>	
014 - Nottingham Trent University	<p>Question 1:</p> <p>We would suggest that as the date for the Examination into the AADMDPD has now been set, this could be referred to in the introduction. It is noted that the Council are commissioning a study looking in detail at the sensitivity of the Districts landscape to further</p>	<p>These comments are welcomed.</p> <p>It is proposed to update the Introduction to give the latest position with the Plan Review.</p>

	<p>solar energy developments. It would be useful to understand what status this study will have, the timescale for its production, whether landowners will be expected to/requested to feed into the study and whether its findings will be subject to formal consultation.</p> <p>Question 2:</p> <p>In Chapter 3, when referring to the National Planning Policy Framework (NPPF), we consider that reference should be made to the recent consultation on changes to the NPPF (which closes on Tuesday 24th September 2024). The proposed changes, if made, will give additional emphasis on the need for local authorities to identify sites for renewable and low carbon energy sources. Proposed amendments to paragraph 164 emphasise that Local Authorities should give support to applications for all forms of renewable and low carbon development. Whilst these changes to the NPPF have not yet been confirmed, they do indicate the current Governments direction of travel in terms of proposals for renewable and low carbon development. When referring to other documents such as 'Powering Up Britain: Energy Security Plan' and others referred to in Chapter 3, we consider that the SPD should make reference to the fact that some of these documents were issued under the previous Government and prior to the general election in July 2024.</p> <p>Question 3:</p> <p>It is helpful that the draft SPD sets out the NSIP process. We consider that it would also be beneficial for the SPD to set out how the Council will engage with applicants of proposals that are deemed to be NSIP's to ensure that all relevant requirements as set out by the Act are followed. For example, does the Council have an identified Officer (or role) who will deal with such applications to ensure all necessary and relevant procedures are followed and deadlines are met, such as working together on the Statement of Common Ground for example?</p> <p>Question 4:</p>	<p>It is proposed to update the Chapter 3 section on the NPPF.</p> <p>It is not considered necessary to state that some documents were issued under the previous Government.</p> <p>It is not considered necessary and may go beyond the remit of the SPD to add further material about NSIPs.</p>
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	<p>Landscape and Visual Impacts - as referred to in our comments on Chapter 1, it would be useful to have further clarification on when the Landscape Sensitivity Study will be completed, when applicants will have access to its findings, and what status it will have.</p> <p>Green Belt - the draft SPD currently states "Chapter 13 of the NPPF has the potential to be a significant constraint on major solar development in the Green Belt". We consider it would be useful for the SPD to elaborate further on this statement, given that the NPPF notes that Very Special Circumstances for renewable energy proposals can be developed, including the fact that the wider environmental benefits associated with increased production of energy from renewable sources may be considered to be a Very Special Circumstance. This is particularly relevant in the context of the proposed amendments to paragraph 164 of the NPPF which is currently out for consultation as referenced earlier in these comments.</p> <p>Cumulative impacts - reference is made to how the forthcoming Landscape Sensitivity Study will be valuable in assisting the assessment of cumulative impacts. As set out earlier in these comments, it would be useful to understand when this study will be available and its intended status. Applications for solar farm proposals which are deemed to be EIA development would assess the cumulative environmental impacts of such proposals. However, it would be useful for the SPD to set out how the Council consider proposals which are deemed to be non EIA development should undertaken this type of assessment.</p> <p>Agricultural Land Classification - it is welcomed that the SPD acknowledges that Newark and Sherwood District is largely rural in character and there is unlikely to be enough previously developed land available to accommodate large scale solar farms. Similarly, it is encouraging that the Council will welcome proposals that use land for agricultural purposes at the same time as solar power generation. However, we would propose that the phrase 'where appropriate' at paragraph 6.41 should be amended to be 'where</p>	<p>It is proposed to update the Section on Green Belt in Chapter 6. 'Grey belt' land will be referred to here and described in the glossary.</p> <p>It is not considered necessary to add extra material about cumulative impacts.</p> <p>The proposed amendment is not considered necessary. The use of land for agricultural purposes at the same time as solar power generation does not require justification. In this context 'appropriate' would perhaps best be understood as meaning 'practicable'.</p>
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	<p>these can be justified and supported by relevant assessments and supporting information', as the definition/interpretation of 'appropriate' may differ between the Council and the applicant.</p> <p>Community Consultation and Benefits - we would welcome further clarification on what the Council means by the statement at paragraph 6.45 "Separately but alongside any planning process the District Council will negotiate on behalf of communities within the District to secure the most generous benefits possible for them". As noted at paragraph 6.44, any obligations through Section 106 agreements have to meet the necessary tests as noted. We would query therefore, what the Council means by 'securing benefits from solar farm proposals outside of the planning process'? How does the Council propose to secure such benefits and how does the Council propose to work with applicants on this matter?</p> <p>Decommissioning and Restoration - further clarification is requested as to in what circumstances the Council would propose to introduce a condition which limits the operational life of the development?</p> <p>Residential Amenity - we would propose a slight amendment to the wording of paragraph 6.56 so that its reads "It should be demonstrated that there will be no unacceptable impacts which cannot be mitigated on residential amenity...." Additionally, in the context of reference to noise, it would be useful to state that an appropriate noise assessment should be undertaken to understand the potential impacts of noise and any proposed mitigation.</p> <p>Question 5:</p> <p>Nottingham Trent University (NTU) operates the Brackenhurst campus to the south of Southwell. NTU are aware of the protected key views in relation to Southwell which are protected under existing policies in the ADMDPD. We would propose a slight amendment to the text at paragraph 7.11 so that its states "Any development proposal within these areas must demonstrate that there will be no negative impact on the views of the heritage assets which cannot be mitigated".</p>	<p>The District Council has a role to play in securing community benefits that goes beyond the planning system and this is dealt with separately to deciding or commenting upon planning applications.</p> <p>It is not considered necessary to add extra material about Decommissioning and Restoration. The draft SPD says that this will be 'where appropriate', and this will be assessed as part of development management processes for each individual application.</p> <p>It is proposed to add 'which cannot be mitigated' to para 6.56.</p> <p>It is proposed to add 'which cannot be mitigated' to para 7.11.</p>
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	<p>Question 6:</p> <p>Reference is made to the forthcoming Landscape Sensitivity Study in Chapter 8. As referred to in our earlier comments, we would welcome clarification on when this study will be available and its intended status.</p> <p>Question 8:</p> <p>NTU welcome the opportunity to make representations to this proposed SPD. It will be useful to have this SPD in place to inform potential applicants of the Council's expectations of what needs to be considered in any applications for major solar farm development. However, NTU consider that a number of points of clarification and some minor amendments are required in order to provide complete clarity on the Council's approach to such applications.</p>	
015 - Historic England	<ul style="list-style-type: none"> • Paragraph 1.9 we note the proposed Landscape Sensitivity Study and would request that the historic environment is fully embedded within this study to ensure that appropriate locations are sought that protect the significance of the historic environment, heritage assets and their setting. As a statutory consultee we are available to offer advice on this study as it is being prepared. • Paragraph 2.2 could include a reference to the historic environment protection/ enhancement measures within the sentence that discusses biodiversity and landscape measures. • Paragraph 3.6 do you have any additional guidance on the historic environment, as this could be referenced here. • We support paragraph 4.1. • Paragraph 6.2 would be useful to ensure that the historic environment is referenced within this section, as a component of landscape, to ensure that it is fully considered at the appropriate time. 	<p>These comments are welcomed. We will aim to ensure that the historic environment is fully considered within the Study, and Historic England will be consulted.</p> <p>It is not considered necessary to add a reference to the historic environment protection/ enhancement measures to para 2.2.</p> <p>It is proposed to add reference to PPG on the historic environment to para 3.6.</p> <p>It is not considered necessary to refer to the historic environment here due to the section of Chapter 6 on Historic Environment and Heritage Assets.</p> <p>It is clearly stated that they are registered parks and gardens in para 6.16 and while</p>

	<ul style="list-style-type: none"> Paragraph 6.16 needs to be clear that the four heritage assets referenced are RPGs. Also, is there any value in only referencing these heritage assets and no others? Paragraph 6.17 would be useful to reference the Conservation Area Management Plans and how any planning application and local plan allocation will need to take account of these documents. The heritage section should also reference archaeology that is unknown but has the potential to be of national importance. It would be useful to broaden the list of what may affect the significance of a heritage asset such as noise/ traffic movement/ the development stage/lighting/glitter and glare from the solar panels etc. Delete heading 'heritage and tree conservation' as there does not appear to be any information relating to this topic. It's promising to have a section that offers some more detail about the issues to consider. We would recommend that prospective developers consult the Historic Environment Record (HER) in the first instance, to understand what heritage assets there might be. Further, we recommend some additional detail about studies that may need to be undertaken to consider the harm to heritage such as landscape and visual assessment, views analysis, statements of significance etc. Any application or local plan allocation should be clear on how the proposal may affect the significance of a heritage asset and if there are any avoidance/ mitigation measures available to overcome any harm. Would be beneficial if the document also related to paragraph 206 of the National Planning Policy Framework (NPPF) and how harm to heritage should be 'wholly/exceptional'. 	<p>other heritage assets are referred to, it would be impractical and unnecessary to list them all individually.</p> <p>It is proposed to add reference to Conservation Area Management Plans to paragraph 6.17</p> <p>It is proposed to add reference to archaeology that is unknown but has the potential to be of national importance and to broaden the list of what may affect the significance of a heritage asset in para 6.21 as suggested.</p> <p>No action necessary. This is a link, not a heading.</p> <p>These proposed amendments should be made to the section of Chapter 6 on Historic Environment and Heritage Assets. The Historic Environment Record will be referred to in paragraph 6.16. 'Any application or local plan allocation should be clear on how the proposal may affect the significance of a heritage asset and if there are any avoidance/ mitigation measures available to overcome any harm' will be added to paragraph 6.19.</p>
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	<ul style="list-style-type: none"> • Historic England recognises the challenge of climate change and are keen to seek opportunities for the historic environment to play a role and adapt in a suitable way. It would also be beneficial to assess if there are any enhancement opportunities available for the historic environment, as a result of proposals. • We welcome a section on archaeology and the need for appropriate archaeological assessments. • We are supportive of a section on cumulative impacts as we find that sometimes an additional site can be the tipping point in a landscape/ impact to a heritage asset. We would welcome heritage being listed within the list on page 18. • We recognise that there is a section on 'glint and glare' and we would welcome it referencing the potential impact on the historic environment. • Paragraph 6.49 also needs to consider the historic environment within the proposals for any grid infrastructure connectivity and how this infrastructure may affect the significance of heritage assets and should avoid harm. • Paragraph 6.50 also needs to consider whether battery storage proposals will have any affect on the significance of heritage assets and avoid any harm. • We welcome a reference to heritage assets within paragraph 6.52 as often these are issues that adversely affect the significance of heritage assets and need careful consideration. • Paragraph 6.53 further needs to consider the impact on the historic environment and how these issues need to be fully considered and harm avoided before proposals are considered. • We welcome a paragraph on Laxton Open Field System and would welcome ensuring any text is clear that harm to these heritage assets should be avoided and other areas for development are sought. 	<p>Reference to enhancement opportunities for the historic environment will be added to paragraph 6.19.</p> <p>Add reference to heritage assets to para 6.33.</p> <p>Add reference to heritage assets to para 6.36 (along with reference to river navigation requested by the Canal and River Trust).</p> <p>It is not considered necessary to make this change to para 6.49</p> <p>It is not considered necessary to make this change to para 6.50</p> <p>It is not considered necessary to make this change to para 6.53</p> <p>It should be made clear that harm to the heritage assets in Laxton should be avoided as the text in the draft SPD relies on Policy ShA/L/1 and this is not certain to be adopted. It is not considered appropriate to say that others areas should be sought as sites near Laxton cannot be ruled out by this SPD.</p>
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	<ul style="list-style-type: none"> • Section 8, we would welcome the inclusion of heritage within this section, as it is a component of landscape. • Section 10. Historic England also offers a pre-application service if useful for prospective developers. • Include heritage within the list of considerations in Appendix 1. <p>There is no detail for Appendices 2-5, is there any other information you require us to consider at this stage.</p>	<p>This is unnecessary as this chapter is about the LCA SPD. It is not considered necessary to mention Historic England's pre-application service.</p> <p>Appendix 1 reproduces Building Research Establishment advice verbatim. Altering it in any way would make it direct advice from Newark and Sherwood District Council and this is not intended. It is not, therefore, considered appropriate to alter Appendix 1.</p>
016 - Central Lincolnshire	<p>Thank you for consulting Central Lincolnshire on your Draft Interim Affordable Housing SPD and Draft Solar Energy SPD. We can confirm that Central Lincolnshire have no comment to make on either SPD at this time.</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>
017 - Newark Town Council	<p>Newark Town Council support the public consultation document.</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>
018 - Upper Witham Internal Drainage Board	<p>The Board has no comment on the documents.</p>	<p>These comments are noted.</p> <p>No actions are proposed.</p>



Newark & Sherwood Local Development Framework

Solar Energy

Supplementary Planning Document

JUNE 2025

Title: Newark and Sherwood Solar Energy Supplementary Planning Document

Status: Adopted

Summary: This Solar Energy Supplementary Planning Document (SPD) provides guidance on the application and interpretation of local and national policy on major stand-alone ground mounted solar photovoltaic (PV) developments in Newark & Sherwood District, with special consideration given to protected local features.

As an SPD the document provides further guidance on policies within the Council's Adopted Core Strategy but does not develop new ones. This SPD is part of the Council's Local Development Framework and will be a material consideration in the determination of planning applications.

Date of Adoption: 16 June 2025

Adopted by: Cabinet 10 June 2025

Consultation Summary: The District Council has consulted local residents, landowners, developers, town & parish councils and other interested parties for a period of 8 weeks from Tuesday 30 July to 24 September 2024. Following consideration of representations received, the Council revised the document and produced a final version for adoption by Cabinet on 16 June 2025.

Availability of Document: Copies of this document, the accompanying and Consultation Statement are on the Council's website: <https://www.newark-sherwooddc.gov.uk/spd/> . In addition, paper copies are available on request.

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1 INTRODUCTION

- 1.1 This document is intended to provide guidance on the application and interpretation of local and national policy on major stand-alone ground mounted solar photovoltaic (PV) developments in Newark & Sherwood District, with special consideration given to protected local features. These developments will be referred to as solar farms. Major solar farm developments are those with a site area of 1 hectare or more, as defined in the Town and Country Planning (Development Management Procedure) England Order 2015.
- 1.2 This document is not intended to identify any preferred sites for major solar farm development or to address issues relating to small scale solar energy developments. Links are provided to other documents where relevant.
- 1.3 As a Supplementary Planning Document (SPD), this document provides guidance on policies but does not develop new ones. This document is part of the District Council's Local Development Framework and will be a material consideration in the determination of relevant planning applications. As well as SPDs, the Local Development Framework is made up of the Amended Core Strategy (ACS), the Allocations & Development Management Development Plan Document (ADMDPD) and the Policies Map:
- [Amended Core Strategy DPD](#)
 - [Newark & Sherwood Allocations & Development Management DPD](#)
 - [Policies Map](#)
- 1.4 In some parishes there are Neighbourhood Plans:
- [Neighbourhood Plans](#)
- 1.5 There are also other Newark & Sherwood District Council Supplementary Planning Documents which can be seen here:
- [Supplementary Planning Documents](#)
- 1.6 This SPD should be read alongside the documents listed above.
- 1.7 The ADMDPD is currently being reviewed to ensure that the allocations and policies it contains continue to be appropriate, up-to-date, and effective. The Amended Allocations & Development Management DPD (AADMDPD), along with its supporting documents, has ~~now~~ been submitted to the Secretary of State ~~to be~~ and is being examined by an independent Planning Inspector in November 2024. At the time of writing, the Inspector's conclusions are awaited. The Submission Version of the AADMDPD and its supporting documents can be viewed here:
- [Submission Version of AADMDPD \(2024\)](#)
- 1.8 More information about the Plan Review can be viewed here:
- [Plan Review](#)

- 1.9 Newark & Sherwood District Council has committed to having a study carried out that will look in detail at the sensitivity of the District's landscape to further solar energy developments. This will take account of all major solar farms that have planning permission, have been developed or are under construction throughout the District and in neighbouring areas. It will also analyse the different landscapes throughout the District and use all this information to provide an indication of the sensitivity of different areas. This will be referred to as the Landscape Sensitivity Study.
- 1.10 This SPD is designed to be read by the general public as well as by developers, planners, and District, Town and Parish Councillors. A Glossary is provided in Chapter 11, and although the language used is intended to be easily understandable, the use of certain technical terms is unavoidable. Consultation responses are welcomed from anyone with an interest in the District or in solar energy developments. The District Council is keen to understand how local residents feel about the issues discussed in this SPD.

2 BACKGROUND

- 2.1 In the Climate Change Act 2008, the UK Government set a legally binding target to reduce its greenhouse gas emissions by 80% by 2050, compared with 1990 levels. In 2019, the Government raised the 80% target to a 100% target by 2050. This is referred to as the net zero target. To meet this target, the Government has set the aim of a fully decarbonised, reliable and low-cost power system by 2025 which would be composed predominantly of wind and solar energy. The aim is to achieve 70 gigawatt (GW) of solar power by 2035 (up from 15.7 GW at the end of 2023).
- 2.2 Solar farms are installations of multiple solar photovoltaic (PV) panels, usually on a frame fixed to the ground. They generate electricity at a large scale to feed into the grid and to supply power to domestic and commercial consumers. The construction, operation, maintenance and decommissioning phases of solar farm projects should all be considered when assessing applications for planning permission. Associated development may include equipment such as inverters, transformers and switchgears; substations; cabling; fencing; and biodiversity and landscaping enhancement measures.
- 2.3 A climate emergency was declared by Newark & District Council on 16 July 2019. The District Council has committed to measures to try and reduce its own carbon footprint as well as that of the local community.

3 NATIONAL POLICY AND GUIDANCE

- 3.1 This chapter discusses the most relevant aspects of national policy and guidance for major solar farms.

The National Planning Policy Framework

- 3.2 The National Planning Policy Framework (NPPF) defines the purpose of the planning system as being to contribute to the achievement of sustainable development, which is described as having three objectives: economic, social and environmental. The environmental objective is *'to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'*
- 3.3 Chapter 14 of the NPPF, 'Meeting the challenge of climate change flooding and coastal change', is of particular relevance to the development of solar farms. Here it is stated that the planning system should support the transition to net zero by 2050 ~~a low carbon future in a changing climate~~. To help increase the use and supply of renewable and low carbon energy and heat plans should, amongst other things, provide a positive strategy for energy from these sources that maximises the potential for suitable development; and consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development.
- 3.4 When deciding on applications for solar farms, the NPPF makes clear that local authorities should:
- 'a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future ~~and recognise that even small-scale projects provide a valuable contribution to significant [sic] cutting greenhouse gas emissions;~~*
 - b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions ~~approve the application if its impacts are (or can be made) acceptable. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas; and~~*
 - c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site, ~~and approve the proposal if its impacts are or can be made acceptable.'~~*
- 3.5 The NPPF provides direction that must always be taken into account when assessing the material considerations set out in Chapter 6, including but not limited to, landscape and visual impacts; biodiversity, habitats and green infrastructure; and historic environment and heritage assets.

Planning Practice Guidance

- 3.6 National Planning Practice Guidance (PPG) on [Renewable and low carbon energy](#) provides useful advice on how to consider applications to develop solar farms. Other PPG may also be relevant, including that on the [Natural Environment](#) and the [Historic environment](#). The PPG on renewable and low carbon energy includes, at the time of writing, sections on:
- How can local planning authorities develop a positive strategy to promote the delivery of renewable and low carbon energy?
 - How can local planning authorities identify suitable areas for renewable and low carbon energy?
 - Do criteria based policies have a role in planning for renewable energy?
 - Are buffer zones/separation distances appropriate between renewable energy development and other land uses?
 - What are the particular planning considerations that relate to large scale ground-mounted solar photovoltaic farms? and
 - Battery Energy Storage Systems.

National Policy Statements

- 3.7 National Policy Statements (NPS) set out Government Policy on Nationally Significant Infrastructure Projects (NSIPs) (see Chapter 5) including how applications for energy infrastructure will be assessed, and the way in which impacts and mitigations will be judged.
- 3.8 The Overarching National Policy Statement for Energy (EN-1):
- outlines the policy context for the development of nationally significant energy infrastructure;
 - explains the urgent need for significant amounts of large-scale energy infrastructure in meeting government's energy objectives;
 - sets out the general policies for the submission and assessment of energy infrastructure applications; and
 - outlines generic impacts which arise from the development of all types of energy infrastructure covered by the energy NPSs.
- 3.9 EN-1 can be seen at:
- [Overarching National Policy Statement for Energy \(EN-1\)](#)
- 3.10 The National Policy Statement for Renewable Energy Infrastructure (EN-3) provides advice specific to renewable energy sources including solar PV, and generic impacts covered by EN-1 with further considerations that are technology specific. Matters covered include:
- irradiance and site topography;
 - network connection;
 - proximity of a site to dwellings;
 - agricultural land classification and land type;
 - accessibility;

- public rights of ways;
- security and lighting;
- capacity of a site;
- site layout design, and appearance;
- project lifetime;
- decommissioning;
- flexibility in the project details;
- biodiversity, ecological, geological conservation and water management;
- landscape, visual and residential amenity;
- glint and glare;
- cultural heritage; and
- construction including traffic and transport noise and vibration.

3.11 EN-3 can be seen at:

[National Policy Statement for Renewable Energy Infrastructure \(EN-3\).](#)

3.12 The National Policy Statement for electricity networks infrastructure (EN-5) should be read alongside EN-1 and has additional policy on relevant matters including:

- factors influencing site selection and design;
- biodiversity and geological conservation;
- landscape and visual;
- noise and vibration;
- Electric and Magnetic Fields; and
- Sulphur Hexafluoride.

3.13 EN-5 can be seen at:

[National Policy Statement for Electricity Networks Infrastructure \(EN-5\)](#)

Other documents

Powering Up Britain: Energy Security Plan

3.14 Updated on 4th April 2023, this document states that Government seeks large scale ground-mounted solar deployment across the UK. It wants development to take place mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.

3.15 This document can be seen at:

[Powering Up Britain: Energy Security Plan](#)

British Energy Security Strategy

3.16 This states that the Government will support the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites. The Government will also

support solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use. This document can be seen at:

[British Energy Security Strategy](#)

The Sixth Carbon Budget: The UK's path to Net Zero

- 3.17 The Climate Change Committee, the UK Government's independent advisor on emissions targets and climate change, published their 'The Sixth Carbon Budget: The UK's path to Net Zero' in December 2020. This sets out the actions the UK will need to take to achieve net-zero emissions by 2050. The report highlights that a portfolio of zero and low-carbon energy generating technologies will be needed to meet future electricity demands including expanding new solar generating technology capacity by 3,000MW on average every year to 2030 and beyond.
- 3.18 In early 2025 the Climate Change Committee (CCC) has committed to advising the UK on the level of its Seventh Carbon Budget, the legal limit for UK net emissions of greenhouse gases over the years 2038 to 2042. The Sixth Carbon Budget can be seen at:

[Sixth Carbon Budget - Climate Change Committee](#)

Energy White Paper Powering our Net Zero Future

- 3.19 This was published in December 2020. Although this document contains little discussion of solar farms, it states that the electricity sector has decarbonised the fastest and will be the bedrock of decarbonising the whole UK economy. The White Paper plans for a doubling of electricity demand as transport and heat switch from petrol/diesel and gas respectively to electricity. It also commits to a fourfold increase in low-carbon generation. Onshore wind and solar are regarded as 'key building blocks of the future generation mix'. This document can be seen at:

[Energy White Paper: Powering Our Net Zero Future](#)

National Infrastructure Assessment

- 3.20 Published on 18th October 2023, the second National Infrastructure Assessment by the National Infrastructure Commission (NIC) recognised the significant progress the UK has made in boosting renewable electricity generation. It also highlighted the key challenges ahead in decarbonising energy and achieving net zero emissions. This document can be seen at:

[National Infrastructure Assessment - NIC](#)

Net Zero Strategy: Build Back Greener

- 3.21 This was published in October 2021 and puts forward policies and proposals for meeting the UK's carbon emissions reduction targets and sets out our vision for a decarbonised economy by 2050. The Net Zero Strategy can be seen at:

[Net Zero Strategy: Build Back Greener](#)

The National Infrastructure Strategy (NIS)

- 3.22 The National Infrastructure Strategy (NIS) was published on 25 November 2020. It discusses the government's plans to improve the quality of the UK's infrastructure move towards the UK having net zero emissions by 2050. This document can be seen at: [National Infrastructure Strategy](#)
- 3.23 Not all the documents listed above will apply to every proposal to develop solar farms, and documents not referred to may be of relevance.

4 LOCAL POLICY

- 4.1 The District Council policies most relevant to the assessment of proposals for solar energy development are Core Policy 10 'Climate Change' of the Amended Core Strategy, and Policy DM4 'Renewable and Low Carbon Energy Generation' of the Allocations & Development Management DPD. Spatial Policy 3 'Rural Areas' of the Amended Core Strategy and Policy DM8 'Development in the Open Countryside' deal with development outside the main settlements, but do not specifically address renewable energy schemes. Proposals should be assessed against all relevant policies, including those concerning transport, biodiversity, landscape character, the historic environment, design and sustainable development. Appropriately located community energy projects will be welcomed as part of solar energy developments.

Core Policy 10 – Climate Change

- 4.2 Core Policy 10 states that the District Council is committed to tackling the causes and impacts of climate change and to delivering a reduction in the district's carbon footprint. The District Council will work with partners and developers to promote energy generation from renewable and low-carbon sources through supporting new development where it is able to demonstrate that its adverse impacts have been satisfactorily addressed. This policy explains that Policy DM4 'Renewable and Low Carbon Energy Generation' provides the framework against which the appropriateness of such proposals will be assessed.

Policy DM4 – Renewable and Low Carbon Energy Generation

- 4.3 As stated in the introduction, the Allocations & Development Management DPD is, at the time of writing, being reviewed and an amended version has now been ~~submitted to the Secretary of State to be examined by an independent planning Inspector~~ submitted to the Secretary of State to be examined by an independent planning Inspector whose conclusions are awaited. The only proposed amendment to the relevant section Policy DM4 is to insert the text underlined below.
- 4.4 Policy DM4 says that planning permission will be granted for renewable and low carbon energy generation development, as both standalone projects and part of other development, its associated infrastructure (including battery storage) and the retrofitting of existing development, where its benefits are not outweighed by detrimental impact from the operation and maintenance of the development and through the installation process upon:
1. The landscape character or urban form of the district or the purposes of including land within the Green Belt arising from the individual or cumulative impact of proposals;
 2. Southwell Views as defined in Policy So/PV or the setting of the Thurgarton Hundred Workhouse, as defined in Policy So/Wh;
 3. Heritage Assets and or their settings;
 4. Amenity, including noise pollution, shadow flicker and electro-magnetic interference;
 5. Highway safety;
 6. The ecology of the local or wider area; or
 7. Aviation interests of local or national importance.

5 NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECTS

5.1 Some solar farms are so large in scale that they are considered to be of national importance and therefore they are regarded as Nationally Significant Infrastructure Projects (NSIPs). These are decided on by the relevant Secretary of State rather than the local authority or local authorities in whose areas they are proposed. NSIPs to generate electricity are dealt with by the Secretary of State for Energy Security and Net Zero. For onshore solar farms, the threshold above which a proposal is regarded as an NSIP is a generating capacity of more than 50 megawatts (MW), although, at the time of writing, the Government is proposing to raise this threshold to 100MW.

5.2 The planning process for dealing with proposals for Nationally Significant Infrastructure Projects (NSIPs) was established by the Planning Act 2008 ('the 2008 Act'). The 2008 Act process, as amended by the Localism Act 2011, involves an examination of major proposals relating to energy, transport, water, waste and wastewater, and includes opportunities for people to have their say before a decision is made by the relevant Secretary of State. The Planning Inspectorate manages many aspects of the 2008 Act process (the NSIP planning application process) on behalf of the Secretary of State.

Local Impact Report (LIR) and the 2008 Act Process

5.3 As part of the 2008 Act process, the relevant local authorities will be invited to submit a local impact report (LIR) giving details of the likely impact of the proposed development on the authority's area.

5.4 Local authorities are encouraged to discuss and work through the issues raised by NSIP proposals with prospective applicants well before the application is submitted, and to engage with applicants in the preparation of statements of common ground. Local authorities will also be involved in considering the statement of community consultation, commenting upon the quality of the applicant's consultation process, producing an LIR and making their own representations on the application.

5.5 Once an application has been accepted for examination, the relevant Secretary of State will appoint an 'Examining Authority' to examine the application. The Examining Authority will be from the Planning Inspectorate and will be either a single Inspector or a panel of three or more Inspectors. As part of the examination process, the Examining Authority will invite relevant local authorities to submit LIRs by a given deadline.

5.6 After the examination has been concluded, the Examining Authority will make a recommendation to the Secretary of State, who will make the decision on whether or not to make a development consent order (DCO) authorising the project. In coming to a decision, the Secretary of State must have regard to any LIRs that are submitted by the deadline. Local authorities are therefore strongly encouraged to produce LIRs when invited to do so.

- 5.7 Relevant local authorities should prioritise preparation of their LIR irrespective of whether the local authority considers the development would have a positive or negative impact on their area. The local authority will be able to submit a separate written representation if it wishes to express a particular view on whether the application should be granted. Where a number of relevant local authorities are involved, local authorities might consider a joint LIR submission.
- 5.8 The Examining Authority is responsible for setting the procedure for the examination and the deadline for the LIR, taking into account the complexity of the application and other relevant matters and bearing in mind the overall timetable in the 2008 Act for examining the application.
- 5.9 The Examining Authority will hold a preliminary meeting before the commencement of the examination. After the preliminary meeting the Examining Authority will circulate a procedural note concerning the details and timetables in respect of various aspects of the examination to all interested parties. This will specify the deadline for the submission of LIRs, and the period within which interested parties will have the opportunity to make written comments on them.
- 5.10 Local authorities should not, however, wait for the deadline to be set following the preliminary meeting to commence work on the LIR. This is because the preliminary meeting is likely to take place a few weeks after the application is accepted, whereas the LIR will be required early in the examination period. The deadline given for the submission of the LIR following the preliminary meeting is likely to be short.
- 5.11 Local authorities are strongly encouraged to use the pre-application period to start their own evaluation of the local impacts of the proposal. Local authorities should then begin to compile the LIR as soon as the application has been accepted formally by the Secretary of State and they have been invited to submit an LIR. This approach will enable the LIR to be produced within the deadlines.
- 5.12 In practice, local authorities will know about the application some time before it is submitted, through the pre-application consultation carried out by the applicant. At this stage they should ensure that they gather sufficient information about the scheme to enable them to commence work on their evaluation of the proposal. This will have the added benefit of enabling them to focus their responses to the applicant's consultation when the application is being prepared.
- 5.13 Local authorities should ensure any necessary internal authorisation processes are in place to meet the timetable. It is entirely a matter for local authorities to determine whether or not an LIR requires approval by Members and in what form.
- 5.14 The 2008 Act process timetable is summarised below, as well as how LIRs fit into that timetable:

The 2008 Act Process

- 1. **Pre-application: No time limit** Applicant develops proposal and carries out pre-application consultation.
- 2. **Acceptance: Up to 28 days** Secretary of State has 28 days to review application and decide whether to accept or reject it.

3. **Pre-examination: 2-3 months** Examining Authority appointed to assess issues and hold preliminary meeting. Preliminary meeting – procedural decision on how application is to be examined.
4. **Examination: Up to 6 months** 6 months to carry out examination.
5. **Report and recommendation: Up to 3 months** 3 months to issue report and recommendation.
6. **Decision: Up to 3 months** 3 months to issue decision and statement of reasons.
7. **Post decision: 6 weeks** 6-week window for legal challenge.

How the local authority fits in

1. **Pre-application: No time limit** Local authorities for site area consulted by applicant on statement of community consultation and participate in pre-application discussions. Local authorities begin evaluation of the local impacts of the proposed scheme.
2. **Acceptance: Up to 28 days** Local authorities and neighbouring local authorities make representations to Secretary of State regarding the adequacy of the consultation carried out by the applicant.
3. **Pre-examination: 2-3 months** Examining Authority proposes draft deadline for the submission of LIRs.
4. **Examination: Up to 6 months** Examining Authority invites and sets deadline for the submission of LIRs. Local authorities submit LIR within specified deadline and make other representations if they wish to do so.

6 MATERIAL CONSIDERATIONS

- 6.1 This section discusses key material considerations that are likely to be of relevance when assessing applications for major solar farm developments. Not all these considerations will apply to every solar farm application, and in some cases other matters not discussed below may be relevant.

Landscape and Visual Impacts

- 6.2 Given the scale of major solar farms, landscape and visual impacts are likely to be potentially significant and should be carefully considered at an early stage of the planning application process. Applications for major solar farms should include a thorough assessment of these impacts. This could be either a Landscape and Visual Assessment (LVA) or a Landscape and Visual Impact Assessment (LVIA), if the proposal is regarded as EIA development.
- 6.3 Assessments of landscape and visual impacts should take account of the Landscape Character Assessment (LCA), discussed in Chapter 8. When available, the Landscape Sensitivity Study will also inform assessments and assist the consideration of cumulative landscape and visual impacts. Guidance on the information which should be provided within a LVIA from the Building Research Establishment (BRE) document 'Planning guidance for the development of large-scale ground mounted solar PV systems' is reproduced in Appendix 1, with minor changes to make it specific to Newark & Sherwood District. This is also applicable to LVAs.
- 6.4 The forthcoming Landscape Sensitivity Study should, when available, be considered a key document in assessing the landscape and visual impacts of proposed solar developments, including cumulative impacts.
- 6.5 Solar farms can cover a significant surface area so the selection of suitable sites and the use of appropriate mitigation measures, including screening such as hedgerows are important to ensure that the area of a zone of visual influence can be minimised. Associated infrastructure such as substations or battery energy storage systems should be located within the development site to minimise landscape and visual impacts.

Biodiversity, Habitats and Green Infrastructure

- 6.6 Newark and Sherwood District contains an impressive range of habitats and species. The District also has a number of sites which receive specific protection because of their international, national or regional importance for nature conservation. These include Birklands and Bilhaugh special area of conservation (SAC), Sherwood Forest national nature reserve (NNR), Sites of Special Scientific Interest (SSSIs), local nature reserves, and Local Wildlife Sites (LWSs), also known as sites of interest for nature conservation (SINCs). More information about these is available at the address below, and the SAC and the NNR are discussed in more detail in Chapter 7.

Biodiversity and Landscape

- 6.7 Core Policy 12 of the ACS and Policy DM7 of the ADM DPD set out how development proposals in Newark & Sherwood District should protect and enhance biodiversity, including through the provision of new or improved green infrastructure. Green

infrastructure (GI) in Newark & Sherwood District should be viewed as a network of green spaces, landscapes and natural elements including bodies of water sometimes referred to as blue infrastructure. To aid the delivery of this network, the District Council has produced a Green Infrastructure Strategy (GIS) that puts forward a range of strategic interventions and also more specific area-based interventions. The GIS can be seen at the address above this paragraph.

- 6.8 Natural England's Green Infrastructure Framework (GIF) helps local planning authorities and developers meet requirements in the NPPF to consider GI in local plans and in new development. It helps to target the creation or improvement of GI, particularly where existing provision is poorest. The GIF sets out principles and standards for good quality GI, offers design guidance and provides mapping of environmental and socio-economic datasets. This document can be seen here:

[Green Infrastructure Home](#)

- 6.9 The NPPF makes clear that when considering planning applications, if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. It is also stated that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

- 6.10 Under the Environment Act 2021, all major projects granted planning permission in England, including solar farms, must deliver at least 10% biodiversity net gain (BNG). BNG means managing land through development in a way that leaves the natural environment in a measurably better state than it was beforehand. It is intended to ensure that through enhancing habitats, developments increase biodiversity and create new green spaces for local communities to enjoy. It should be noted that 10% is a minimum, but not a suggested maximum, and projects delivering a higher percentage of BNG are welcomed. Solar farms often have the potential to contribute a significantly greater BNG without jeopardising the viability of the project, and this will be sought by the District Council where possible. The section of this chapter beginning at paragraph 6.61 entitled 'Ministry of Defence interests' should be referred to when considering the provision of BNG enhancements. The Environment Act 2021 can be seen here:

[Environment Act 2021](#)

- 6.11 Newark & Sherwood District Council have worked collaboratively with other local authorities and organisations including Natural England and Nottinghamshire Wildlife Trust to produce 'A Biodiversity Net Gain Framework for Nottinghamshire and Nottingham'. This provides detailed information about how BNG should be delivered in Nottinghamshire and sets out over-riding principles to guide development. The BNG Framework can be seen here:

[Link to be inserted in due course]

- 6.12 The Environment Act 2021 builds upon the Government's: 'A Green Future: Our 25 Year ~~Environment~~ Plan to Improve the Environment (25 YEP)', launched in January

2018. The 25 YEP, amongst other things, commits to the development of a Nature Recovery Network (NRN) providing 500,000 hectares of additional wildlife habitat, more effectively linking existing protected sites and landscapes, as well as urban green and blue infrastructure. The 25 YEP can be seen here:

[A Green Future: Our 25 Year Plan to Improve the Environment](#)

- 6.13 Provisions introduced by the Environment Act 2021 require the development of Local Nature Recovery Strategies (LNRS) across England. These will set out priorities for biodiversity outcomes, and the actions that need to be undertaken to achieve these outcomes. LNRS will be key to the development of the NRN. At the time of writing, the Nottinghamshire LNRS is being developed collaboratively by local authorities and environmental organisations. Once produced, the LNRS will facilitate the enhancement of habitats to increase biodiversity through development proposals.
- 6.14 The production of the LNRS will draw upon Nottinghamshire's Local Biodiversity Action Plan (LBAP). The LBAP, among other things, identifies targets for species and habitats appropriate to the county, and provides a basis for monitoring progress in biodiversity conservation at both local and national levels. The LBAP ~~has~~ was developed by Nottinghamshire's Local Biodiversity Action Group, who have also produced Biodiversity Opportunity Maps (BOMs) across the county, including for Newark & Sherwood District. BOMs provide a spatial vision of how biodiversity can be improved by focussing on areas where action to enhance, enlarge, expand and link up habitats would have the most benefits.

More information about the LBAP can be seen here:

[Nottinghamshire Biodiversity Action Group](#)

More information about Nottinghamshire BOMs can be seen here:

[Biodiversity Opportunity Mapping – Nottinghamshire Biodiversity Action Group](#)

The Newark & Sherwood District BOM (April 2022) can be seen here:

[The Nottinghamshire Biodiversity Opportunity Mapping Project \(Newark & Sherwood District\)](#)

- 6.15 Interconnections between valuable habitats are an important aspect of biodiversity enhancement and contribute significantly to its effectiveness. Where possible, newly created or enhanced habitats should be connected with other nearby areas that meaningfully support biodiversity, and existing connecting routes for wildlife should be enhanced. Measures to protect and enhance biodiversity can contribute to a number of objectives such as BNG ~~net gain~~, the provision of GI, the LNRS and the NRN at the same time.

[Historic Environment and Heritage Assets](#)

- 6.16 Newark and Sherwood District has a rich historic environment with its own distinctive identity. This includes more than 1,300 buildings, structures and monuments that are regarded to be of national significance and designated as listed buildings. There are more than 70 scheduled monuments including a wide range of archaeological types,

from medieval castle remains to prehistoric mounds and civil war fortifications. There are 47 conservation areas and 4 registered parks and gardens:

- [Newark Castle Gardens \(Grade II\)](#)
- [Rufford Abbey](#) (Grade II)
- [Thoresby Park](#) (Grade I)
- [Thurgarton Hundred Workhouse](#) (Grade II*)

Developers should consult the consult the Nottinghamshire [Historic Environment Record \(HER\)](#) to understand what heritage assets might be present on a site. Studies may need to be undertaken to consider potential harm to heritage including landscape and visual assessment, views analysis and statements of significance.

- 6.17 Detailed information about conservation areas including in some cases their character appraisals can be seen here:

[Conservation Areas](#)

Conservation area character appraisals may contain management plans and any planning application should take account of these.

- 6.18 The District also features a range of non-designated heritage assets, identified by the District Council as having a degree of significance because of their local heritage interest. They are not otherwise protected by formal designation. These may include:
- buildings and structures
 - local character areas
 - archaeological sites
 - landscapes or landscape features

- 6.19 Any application or local plan allocation should be clear on how the proposal may affect the significance of a heritage asset and if there are any avoidance/ mitigation measures available to overcome any harm. Proposals that provide enhancement opportunities for the historic environment will be welcomed. More information about heritage conservation in Newark & Sherwood District can be seen here:

[Heritage and Tree Conservation](#)

- 6.20 Core Policy 14 of the ACS and Policy DM9 of the ADM DPD set out how development proposals in Newark & Sherwood District with the potential to impact on the historic environment will be considered. Paragraph 213 of the NPPF states that substantial harm to, or loss of, many types of heritage assets should be wholly exceptional.
- 6.21 PPG advises that great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. The significance of a heritage assets may be affected by considerations including but not limited to noise, traffic movement, development

stage issues, lighting, and glint and glare from solar panels. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large-scale solar farms on such assets. Depending on their scale, design and prominence, a large-scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset.

- 6.22 Ground mounted solar development has potential to impact on archaeology through ground disturbance from the construction process including the digging of foundations, and the erection of fencing. There could be archaeology on development site that is unknown but has the potential to be of national importance. If a proposed development site includes, or has the potential to include, heritage assets with archaeological interest, developers must submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 6.23 Desk-based archaeological assessments should follow standards and guidance set out by the [Chartered Institute for Archaeologists](#). Newark & Sherwood District Council also recognises the [Lincolnshire Archaeological Handbook](#), which sets out practical guidelines for a consistent approach to the historic environment.
- 6.24 Significant archaeological locations in the Newark and Southwell areas have individual policies in the emerging AADM DPD which set out how the particular site circumstances that should be considered. NUA/AR/1 concerns the Farndon & River Devon Ice Age Landscape, NUA/AR/2 deals with archaeology deriving from the Civil War around Newark and So/AR/1 covers Southwell Roman Villa. Only limited weight can be attached to these policies at the time of writing, because the AADM DPD has not yet been ~~they have not yet been examined or~~ adopted.
- 6.25 Certain heritage assets are discussed in more depth in Chapter 7.

Green Belt

- 6.26 The extent of the Green Belt in Newark & Sherwood District is shown in Appendix 2.
- 6.27 Spatial Policy 4B (Green Belt Development) of the ACS defers to national policy for the assessment of certain types of applications in the Green Belt that would include major solar farms. Chapter 13 of the NPPF, ~~has the potential to be a significant constraint on~~ should be referred to when considering major solar farm developments in the Green Belt.
- 6.28 The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. Areas of land within the Green Belt may be recognised as 'grey belt' if they do not strongly contribute to certain purposes specified in the NPPF. Any applicant arguing that their site is grey belt should submit an assessment that demonstrates this.
- 6.29 National policy makes clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases, developers will need to

demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

Flooding and Drainage

- 6.30 Areas in Newark & Sherwood District are particularly vulnerable to flood risk from local rivers, including the River Trent. In line with Core Policy 9 of the ACS and Policy DM5 of the ADM DPD, solar farm developments should make a positive contribution to flood risk mitigation and water management including, where feasible, the use of Sustainable Drainage Systems. Solar farms should be designed in such a way that the risk of surface water flooding is not increased and is where possible reduced. All proposals to develop major solar farms must be accompanied by a Flood Risk Assessment, as set out in footnote 63 59 of the NPPF.
- 6.31 A Flood Risk Assessment provides a site-specific analysis of how a development affects flood risk and proposes suitable mitigation measures which could be incorporated into the scheme (if applicable). For a development to gain planning permission, a Flood Risk Assessment should demonstrate that the site will remain safe in the future, taking into account the effects of climate change. Core Policy 10 of the ACS provides further information on requirements relating to flood risk management.

Cumulative Impacts

- 6.32 The impacts of major solar farm development proposals cannot be fully considered in isolation. The assessment of such applications in Newark & Sherwood District should take into account other consented, under construction and developed schemes that are of a similar nature, or otherwise contribute to a cumulative effect, both in the District and in neighbouring areas. In certain circumstances, where the District Council is the decision maker, or will make recommendations about a decision, it could be necessary to consider schemes not consented but progressing through the planning system to seek to understand if the scheme is at a point where it could be taken into account when considering cumulative impacts.
- 6.33 In Paragraph 1650, the NPPF states that while plans should provide a positive strategy for the use and supply of renewable and low carbon energy, they should also ensure that adverse impacts are addressed appropriately including cumulative landscape and visual impacts. Cumulative impacts relating to highways, flood risk, pollution, heritage assets, residential amenity and other relevant matters may also be material considerations.
- 6.34 The forthcoming Landscape Sensitivity Study will be valuable in assisting the assessment of cumulative impacts. It will provide a baseline by creating a detailed picture of the development of solar energy schemes in Newark & Sherwood District and neighbouring areas, and it will also assess the sensitivity of landscapes to further such development in the light of existing cumulative impacts.

Glint and Glare

- 6.35 As stated in EN-3, solar panels are specifically designed to absorb, not reflect, sunlight. Solar panels may, however, reflect the sun's rays at certain angles, causing glint and

glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.

- 6.36 Applicants should identify potential receptors to assess possible glint and glare issues and determine if a glint and glare assessment is necessary. When such an assessment is necessary, applicants are expected to consider how glint and glare could affect receptors and provide an assessment of potential impacts including the duration of the effect and the intensity of the reflection. Where solar farms would be visible from the Strategic Road Network (SRN), developers must provide an appropriate assessment of the intensity of solar reflection likely to be produced, which demonstrates that safety on the SRN is not compromised. It may be necessary to consider impacts on aviation, river navigation and heritage assets.
- 6.37 The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. There may be a need to account for panels on solar trackers if they are proposed as these may cause differential diurnal and/or seasonal impacts. Solar trackers are support structures that allow solar panels to follow the path of the sun and absorb more solar radiation.
- 6.38 When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels.

Agricultural Land Classification

- 6.39 Agricultural land is graded from 1 to 5, with Grade 3 subdivided into 3a and 3b. The 'Best and Most Versatile' land (BMV) is defined as Grades 1, 2 and 3a. Applicants for major solar farm developments should undertake an Agricultural Land Classification survey including appropriate justification or mitigation if any BMV land is to be used.
- 6.40 PPG advises that effective use of land should be encouraged by focussing large scale solar farms on previously developed and non-agricultural land (provided that it is not of high environmental value). As Newark & Sherwood District is largely rural in character, it is unlikely that there will be enough previously developed land available to accommodate large scale solar farms, but where feasible the use of non-agricultural land should be prioritised.
- 6.41 When the use of agricultural land is proposed, it should be demonstrated that this is necessary, and that where possible poorer quality land has been used in preference to higher quality land. Planning authorities should consider whether the proposed development would allow for continued agricultural use and if it could enhance biodiversity. Proposals that use land for agricultural purposes at the same time as solar power generation will be welcomed where appropriate.
- 6.42 EN-3 advises that while land type should not be a predominating factor in determining the suitability of the site location for solar farms regarded as NSIPs, applicants should, where possible, utilise suitable previously developed land, brownfield land,

contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of Best and Most Versatile agricultural land where possible.

Community Consultation and Benefits

- 6.43 Developers of solar farms will be expected to demonstrate that they have engaged in meaningful consultation with local communities before submitting their application. This will allow communities to gain a better understanding of the project and its potential impacts, and also to make suggestions which the developer can consider when finalising their proposals. It is recommended that community consultation continues throughout the lifetime of the project. Applicants for NSIPs are legally required to carry out pre application consultation on proposed developments in line with a Statement of Community Consultation (SOCC) which relevant local authorities will have the opportunity to comment on. The application must include a Consultation Report setting out how they have complied with the statutory pre-application consultation requirements, and that they have had regard to the responses. The Planning Inspectorate will consider the Consultation Report, alongside any adequacy of consultation representation made by a local authority and the other application documents, before deciding whether or not to accept the application for examination.
- 6.44 Community benefits associated with solar farms can be used to mitigate the impacts of the development and alleviate the concerns of local residents. Applicants are encouraged to outline the benefits of their proposal within their planning application. For community benefits to be secured through planning obligations known as section 106 agreements they must be directly related to the development; necessary to make the development acceptable in planning terms; and fairly and reasonably related in scale and kind to the proposal.
- 6.45 Separately but alongside any planning process the District Council will negotiate on behalf of communities within the District to secure the most generous benefits possible for them. Where appropriate, the District Council will seek to secure benefits on behalf of partner organisations such as the Nottinghamshire Wildlife Trust and the Royal Society for the Protection of Birds (RSPB). The District Council will normally seek to secure community benefits throughout the full length of a solar farm project, not just the operational phase.

Decommissioning and Restoration

- 6.46 Although solar farms can typically be expected to operate for up to 640 years, they are usually temporary structures and how they will be decommissioned should be considered as part of any planning application. Where appropriate, the District Council may impose a condition limiting the operational life of the development. This would mean that for a solar farm to operate beyond the period specified in the condition, a new planning application would need to be granted permission. The District Council would prefer that decommissioning takes place in accordance with approved details within a Section 106 agreement, but this could also be controlled by planning conditions.

- 6.47 Any application to develop a solar farm should be supported by information about how the project will be decommissioned and how the land used will be, at a minimum, restored to its previous condition. Any landscape improvements, biodiversity enhancements and community benefits should be retained if appropriate. No later than 12 months prior to the expiry of the planning permission, or within 18 months of the cessation of electricity generation or storage on the site, whichever is the sooner, a decommissioning scheme shall be submitted to and approved by the local planning authority. The decommissioning scheme shall include a programme and a scheme of work and shall be implemented in accordance with the approved details. The operator shall notify the local planning authority in writing within five working days following the cessation of electricity generation or storage. All buildings, structures and associated infrastructure shall be removed within 12 months of the approval of the decommissioning scheme, and the land restored, in accordance with the approved details.

Grid Connection

- 6.48 To supply power to consumers, solar farms need to be connected to either the transmission or the distribution network. This requires approval from the licensed distribution network operators (DNOs), National Grid or both. The connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.
- 6.49 To maximise existing grid infrastructure, minimise disruption and reduce overall costs, applicants may choose a site based on nearby available grid export capacity. Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure. Major solar farm applications should include details of all the infrastructure required including cabling. Cabling should normally avoid areas of high landscape, ecological or archaeological sensitivity, and should be designed so as not to be overly extensive or visually intrusive. In some cases, it may be possible to mitigate impacts in sensitive areas through undergrounding cable connections.

Battery Energy Storage Systems

- 6.50 Battery energy storage systems (BESS) can help to maximise the efficiency of an installation by allowing energy to be stored. PPG states that where planning permission is being sought for development of battery energy storage systems of 1 MWh or over, and excluding where battery energy storage systems are associated with a residential dwelling, applicants are encouraged to engage with the relevant local fire and rescue service before submitting a planning application. This is so matters relating to operational safety can be fully considered before an application is made, including the siting and location of BESS within the development site, the prevention of the impact of thermal runaway, and emergency services access, ~~can be considered before an application is made.~~ Appendix 6 of this SPD reproduces guidance from the Environment Agency on BESS.

Minerals Safeguarding

- 6.51 The Development Plan for Newark & Sherwood District includes the Nottinghamshire Minerals Local Plan which identifies Minerals Safeguarding Areas. Within these areas, consideration of the impact of a proposed development on minerals resources may be required in line with the provisions of that Plan. The Minerals Safeguarding Areas are shown on the Policies Map. The Nottinghamshire Minerals Local Plan can be seen at the address below:

[Nottinghamshire County Council Adopted Minerals Local Plan](#)

Site Security

- 6.52 Planning applications for solar farms should include details of all site security measures such as perimeter fencing, CCTV cameras and lighting. It is recognised that such measures will usually be necessary. Consideration should be given to potential impacts including those upon habitats and biodiversity, landscape, heritage assets, public rights of way and residential amenity. How potential impacts might vary according to the time of day or the season of the year should be taken into account. Security measures, in particular fencing and lighting, should not be excessive and may require justification. Adverse visual impacts should be mitigated through appropriate design or other measures.

Access, Traffic and Transport

- 6.53 Spatial Policy 3 of the ACS states that new development in rural areas should not have an undue impact on local infrastructure including the transport network. The most significant traffic impacts of solar farms are usually at the construction stage, with only limited access required during the operational phase, often for maintenance. Given the largely rural nature of Newark & Sherwood District, the suitability of access routes access for the delivery of the components of a solar farm and the machinery necessary for its construction should be assessed at the earliest stage possible.
- 6.54 If the proposed development of a solar farm has the potential to affect the operation of the ~~Strategic Road Network (SRN)~~, applicants should consult National Highways, preferably at the pre-application stage. Information should be provided on possible trips generated during the construction and the operational phases of development. As any solar farm development in Newark & Sherwood District is likely to impact the local road network, applicants should consult Nottinghamshire County Council, which is the highways authority for roads not part of the SRN. Detailed assessment of potential traffic impacts is likely to be required.
- 6.55 Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping. In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network. Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.

Residential Amenity

- 6.56 It should be demonstrated that there will be no unacceptable impacts which cannot be mitigated on residential amenity during the construction of a solar farm. In order

to minimise disturbance, it may be necessary to impose conditions that control the routes taken by construction vehicles and/or restrict the hours of construction.

- 6.57 During the operation of solar farms, ancillary equipment such as invertors, transformers or sub-stations may produce noise. These should be sited far enough away from any nearby dwellings that there are no significant impacts on residential amenity.

Public Rights of Way

- 6.58 Newark & Sherwood District contains a number of Public Rights of Way (PROW) which connect settlements and offer opportunities for non-motorised transport. On these paths, people are permitted to walk dogs on a lead or under close control; use a pushchair or wheelchair; and take a short route around an illegal obstruction or move it to get past. Nottinghamshire County Council is the local highway authority and is therefore responsible for PROW in Newark & Sherwood District. The creation of new PROW will be welcomed as part of planning applications for solar energy developments.
- 6.59 There are four kinds of PROW, which in Nottinghamshire are marked by different coloured arrows:
- Footpaths are marked with yellow arrow and can only be used by walkers.
 - Bridleways are marked with blue arrows and can only be used by walkers, horse riders and cyclists.
 - Restricted byways are marked with burgundy arrows and can only be used by walkers, horse riders, cyclists and horse and cart users.
 - Byways are marked with red arrows and can be used by walkers, horse riders, cyclists, car users, motorcyclists and horse and cart users.
- 6.60 Applicants for solar farm developments will need to demonstrate to Nottinghamshire County Council that any PROW affected will remain accessible and usable. If any PROW needs to be temporarily or permanently diverted, an Order securing the diversion of the path must be agreed with both the District and County Councils. The new route should be available to the public before the existing route is rendered unusable. More information about PROW can be seen here:

[Rights of Way \(Public Paths\) - Nottinghamshire County Council](#)

Ministry of Defence interests

- 6.61 Paragraph 102 of the NPPF requires that planning policies and decisions take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Ministry of Defence (MOD) installations are protected by safeguarded zones. Newark & Sherwood District both contains and is washed over by statutory safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Waddington, RAF Barkston Heath, RAF Syerston, RAF Cranwell, and Eastern 1 WAM (Wide Area Multilateration) Network. In addition to permanent physical development within these zones, the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.

- 6.62 Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and would be at critical stages of flight. Within these statutory consultation zones the creation or enhancement of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. Within these zones development that has the potential to provide an attractant environment to bird species hazardous to aviation safety may be subject to design requirements or for management plans to be applied. This would include both on and off-site provision of BNG.
- 6.63 Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. This includes solar farms which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- 6.64 Applications to develop solar farms in Newark and Sherwood District will only be supported if they would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites or any other assets. Some forms of environmental improvement or enhancement associated with solar energy schemes may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other relevant site should be assessed against statutory safeguarding zones and the MOD consulted where any element falls within these zones.

7 PROTECTED LOCAL FEATURES

- 7.1 Newark & Sherwood District has a number of unique protected features, some of which are discussed below. Impacts upon habitats, biodiversity and heritage assets, whether in areas mentioned in this chapter or not, should be carefully considered throughout the District and in neighbouring areas.

Birklands and Bilhaugh Special Area of Conservation

- 7.2 One of the key environmental assets in Newark & Sherwood District is Birklands and Bilhaugh Special Area of Conservation (SAC). SACs are protected areas designated under the Conservation of Habitats and Species Regulations 2017 (as amended). The SAC consists of two discrete parcels, with one in the southern part of Sherwood Forest National Nature Reserve (NNR) and the other, smaller, component located within the privately owned and administered Thoresby Estate, to the north-east.
- 7.3 The SAC supports extensive areas of old acidophilous oak woodland which was managed for hundreds of years as an extensively grazed wood pasture. This habitat is slowly reverting to high forest woodland and heath following the cessation of traditional livestock grazing. The SAC is particularly notable for its remnant ancient and decaying oak trees which support a wide variety of invertebrates and fungi, some of which are rare.
- 7.4 Air pollution is a problem for the SAC and has already caused a decrease in lichen diversity. Due to its location, the SAC is subject to recreational pressure, which can damage its fragile habitat. A map of the SAC can be seen in Appendix 3.

Sherwood Forest Possible Potential Special Protection Area

- 7.5 Special Protection Areas (SPAs) are protected areas for birds in the England and Wales also classified under the Conservation of Habitats and Species Regulations 2017 (as amended). The Joint Nature Conservation Committee (JNCC) and Natural England (NE) recommend to the Government areas to be classified as SPAs. While Government considers this step, the area is called a potential or proposed SPA (pSPA) and the site is provisionally afforded protection until a final decision is made. If the Government decides to follow the recommendation and to classify the area, it will become an 'SPA' and protection will continue to be in place.
- 7.6 Parts of Sherwood Forest are important habitats for nightjars and woodlarks, and the significance of this should not be underestimated. No conclusion has yet been reached about the possible future classification of parts of Sherwood Forest as a SPA for its breeding nightjar and woodlark populations, but Natural England advise that these should be regarded as a possible potential Special Protection Area (ppSPA).
- 7.7 This recommendation follows a decision in 2011 to refuse to grant planning permission for an Energy Recovery Facility at Rainworth where the potential impacts on nightjars and woodlarks and their habitats was given significant weight. In light of this decision, Natural England recommend that a precautionary approach should be adopted which ensures that reasonable and proportionate steps have been taken in order to avoid or minimise, as far as possible, any potential adverse effects from development on the breeding populations of nightjar and woodlark in the Sherwood Forest area. This

means that, in effect, Natural England expect to see the same approach to development potentially affecting the ppSPA as would be taken with development potentially affecting a pSPA.

- 7.8 Natural England's Advice Note to Local Planning Authorities regarding the consideration of likely effects on the breeding population of nightjar and woodlark in the Sherwood Forest region, which contains a map showing the areas of greatest ornithological interest for breeding nightjar and woodlark, can be seen at the address below:

[Advice Note on the Sherwood ppSPA \(Natural England\)](#)

- 7.9 It should be noted that there are a number of SPAs that are within 40km of the District, and any development proposal with the potential to affect any of these should be supported by evidence that its impacts will not be unacceptable.

Southwell Protected Views

- 7.10 Key to the distinctive character of Southwell are the views of and across the principal heritage assets of Southwell Minster, the Archbishop's Palace, Thurgarton Hundred Workhouse and the Holy Trinity Church. These views are protected under Policy So/PV of the ADMDPD and Thurgarton Hundred Workhouse is also specifically protected under Policy So/Wh of the ADMDPD.
- 7.11 Areas called 'view cones' have been defined on the Policies Map. Any development proposal within these areas must demonstrate that there will be no negative impact on the views of the heritage assets which cannot be mitigated. The view cones are not intended to definitively define the extent of views or settings and development proposals which fall outside of them may still present the potential for detrimental impacts. The Policies Map for Southwell can be seen in the ADMDPD.
- 7.12 Any proposal with the potential to impact upon the protected views should take account of the Southwell Landscape Setting Study which can be viewed at the bottom of the link below:

[Southwell Landscape Setting Study \(2012\).](#)

Sherwood Forest National Nature Reserve

- 7.13 Sherwood Forest National Nature Reserve (NNR) includes the ancient forests of Birklands and Budby South. NNRs in England are designated by Natural England as key places for wildlife and natural features. They were established to protect the most significant areas of habitat and of geological formations.
- 7.14 Sherwood Forest NNR contains more than a thousand ancient oaks most of which are known to be more than 500 years old. The most famous of these, the Major Oak, may be nearly twice that age. Other trees common here include silver birch, rowan, holly and hawthorn.
- 7.15 ShAP 1 of the ACS commits the District Council to maintaining and enhancing the ecological, heritage and landscape value of the Sherwood Area. This includes ensuring that development does not have a detrimental impact on national, regional, county

and locally designated sites. A map of Sherwood Forest NNR can be seen in Appendix 4.

Laxton Open Field System

- 7.16 Laxton is the last remaining village in England that operates an open field system of farming under the supervision of a manorial Court Leet. Harm to the heritage assets in Laxton should usually be avoided. The historic landscape around Laxton and a Conservation Area are identified on the Policies Map and it is intended that these will be protected by Policy ShA/L/1 of the emerging AADMDPD. This policy requires that development proposals do not detrimentally impact on Laxton's heritage assets and the special character of the Conservation Area unless public benefits outweigh the detrimental impact. The historic landscape around Laxton is shown in Appendix 5.

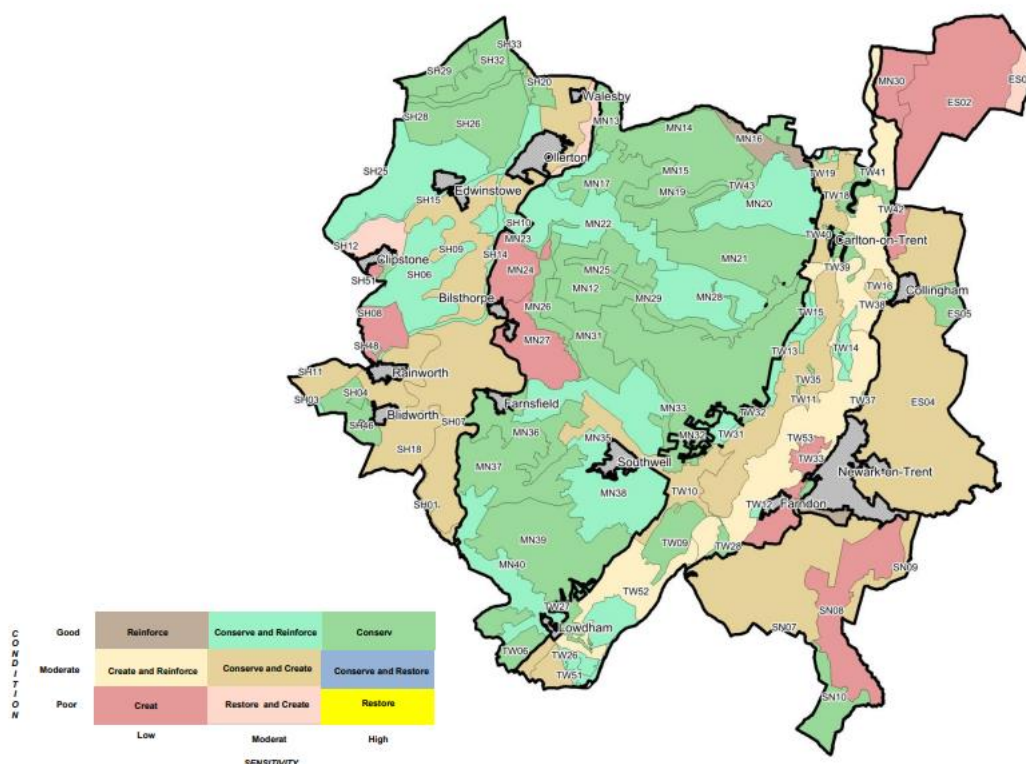
8 LANDSCAPE CHARACTER ASSESSMENT

- 8.1 To assist with the protection and enhancement of local landscapes and the natural environment, the District Council has had comprehensive assessment of landscape character undertaken. The Newark and Sherwood Landscape Character Assessment (LCA) SPD can be seen here:

[Landscape Character Assessment SPD](#)

- 8.2 This document provides an objective assessment of the varied landscape in Newark and Sherwood. It also gives a greater understanding of what makes different areas of the District locally distinctive. Specific Landscape Policy Zones (LPZs) are identified and related actions recommended, providing a basis for considering landscape issues as part of decisions over new development. Landscape Policy Zones and Landscape Actions for each Policy Zone can be seen below:

Landscape Policy Zones and Landscape Actions for each Policy Zone



- 8.3 As a supplementary planning document, the LCA SPD can be a material consideration within the planning process. It is expected that development proposals will positively address the implications of the LPZs and demonstrate that the aims and objectives for that area would be contributed to.
- 8.4 Core Policy 13 of the ACS commits the District Council to working with partners and developers to ensure that new development makes a positive contribution to the relevant LPZ(s) and is consistent with the defined landscape conservation and enhancement aims.

- 8.5 The LCA will inform the production of the Landscape Sensitivity Study. When the Study is available, it should be read alongside the LCA in order to gain a comprehensive understanding of the effects of proposed or consented solar farm developments on the District's landscape.

9 ENVIRONMENTAL IMPACT ASSESSMENT

- 9.1 Major solar farm developments fall under Schedule 2 to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This means that such developments may need to be screened by the District Council to determine whether they constitute Environmental Impact Assessment (EIA) development.
- 9.2 Applicants for major solar farm developments are advised to apply to the District Council for an EIA Screening Opinion before submitting their planning application. If a particular development proposal is considered to be EIA development, the planning application must be accompanied by an Environmental Statement that has been prepared in accordance with Regulation 18 of the EIA Regulations 2017 (as amended).
- 9.3 If a proposed development is considered to require an EIA, detailed advice can be requested by submitting an EIA Scoping Opinion to the District Council.

10 PLANNING APPLICATION PROCESS

- 10.1 It is recommended that developers of major solar farms seek pre-application advice. This will provide an initial assessment of whether the proposal is likely to be acceptable although no guarantee can be offered that permission will be granted. It is beneficial to both the applicant and the District Council to consider at this stage what supporting assessment work will be required to accompany the application and what level of detail will be necessary. Information about pre-application advice in Newark & Sherwood District can be seen here:

[NSDC Pre-Application Service](#)

- 10.2 The District Council will expect to see evidence of community consultation, including with Parish Councils, as part of any planning application for a major solar farm. Parish Councils are important consultees that can provide valuable insight into local issues and opportunities. Details of how to submit a planning application to the District Council can be seen here:

[Submitting an Application to NSDC](#)

- 10.3 Upon receipt of a planning application, the District Council will cross check the information submitted against the planning application requirements, as set out in the validation checklist:

[NSDC Validation Checklists](#)

11 GLOSSARY

AADM DPD	An amended version of the Allocations & Development Management Development Plan Document (DPD) (see below). This has, at the time of writing, been submitted to the Planning Inspectorate prior to an Examination in Public. After this, it is expected that the document will be adopted and will supersede the current Allocations & Development Management DPD.
ACS	The Amended Core Strategy, which sets out the District Council's spatial policy framework for delivering the development and change needed to realise the District Council's vision for the District up to 2033. It is a key part of the Development Plan.
ADM DPD	The Allocations & Development Management Development Plan Document. This document sets out allocations of land for new housing, employment and other development in the main settlements in the District. It also sets out development management policies for use in the consideration of planning applications. It is a key part of the Development Plan.
Battery energy storage systems	Battery energy storage systems (BESS) are devices that enable energy from renewable sources, like solar and wind, to be stored and then released when the power is needed most.
Brownfield	Previously developed land.
Climate Change Act 2008	An Act of Parliament setting out the UK's approach to combatting and mitigating climate change.
Distribution network operators	Distribution Network Operators (DNOs) in the UK manage the electric power and gas distribution systems which deliver to end users.
DPD	A Development Plan Document.
EN-1	The Overarching National Policy Statement for Energy.
EN-3	The National Policy Statement for Renewable Energy Infrastructure.
EN-5	The National Policy Statement for electricity networks infrastructure.

Gigawatt (GW)	One billion watts.
Greenfield	Land that has not been previously developed.
<u>Grey belt</u>	<u>For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 of the NPPF. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 of the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.</u>
Irradiance	Irradiance refers to the amount of radiant power per unit area received from a radiation source. In the case of solar energy schemes, this source is the sun.
Landscape Character Assessment	The Landscape Character Assessment (LCA) is a District level assessment of landscape character which forms part of the wider assessment for Nottinghamshire. The document provides an explanation of the differences between landscapes that is based around a sense of place, local distinctiveness, characteristic wildlife, and natural features. By identifying specific Landscape Policy Zones (LPZs) and related actions the LCA plays an important role in the planning framework and in decisions over new development.
Landscape Sensitivity Study	A study that assesses the ability of a landscape to accommodate change arising from specified types of development such as solar energy schemes.
Megawatt (MW)	One million watts.
Neighbourhood Plans	Neighbourhood plans set out policies to help shape and deliver new development in a specific area.
National Grid	The system operator for Great Britain's electricity and gas supply.
National Planning Policy Framework (NPPF)	The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied.
Photovoltaics	Photovoltaics is a way of turning sunlight into electricity using special materials that

	absorb and release electrons when exposed to light. The materials are called semiconductors and they form the core of solar cells, which are the building blocks of solar panels or modules.
Planning practice guidance (PPG)	Planning practice guidance (PPG) provides detail on the interpretation and implementation of national policy relevant to various areas of the planning system.
Statement of Community Involvement (SCI)	The Statement of Community Involvement (SCI) is a statutory document that must be prepared by local planning authorities. Legislation requires that this document must set out the authority's policies to facilitate involvement of those persons and organisations who have an interest in the preparation of a local plan, other planning policy documents, neighbourhood plans and the consideration of planning applications.
<u>Strategic Road Network (SRN)</u>	<u>The Strategic Road Network (SRN) in England comprises more than 4,500 miles of motorways and major A roads, which are at the core of the national transport system. Managed by the Highways Agency, the SRN represents around 2% of the total length of England's road network but carries roughly one-third of the total motor vehicle traffic in the country.</u>
Supplementary Planning Document (SPD)	A Supplementary Planning Document (SPD) provides detail on the interpretation and implementation of policies within the District's Development Plan.
Sulphur hexafluoride (SF ₆)	Sulphur hexafluoride (SF ₆) is a synthetic, odourless gas that is used in the electricity industry to keep networks running safely and reliably. SF ₆ is a 'greenhouse gas' that has long played a part in global warming, similar to that of carbon dioxide (CO ₂). SF ₆ has historically been used in a variety of applications, from metal smelting to filling double-glazing panels, but the electricity industry is one of the few where it is still used today, due to the technical challenges of replacing it.

APPENDIX 1 - INFORMATION TO BE INCLUDED IN A LANDSCAPE AND VISUAL IMPACT ASSESSMENT

1. **Description of the development**

- The need for the development set within local, regional and national strategies;
- The timescale for construction, operation and decommissioning.
- The site's location and overall layout;
- Solar panel design and specification, method of construction/installation;
- Reasonable estimates of quantity and type of traffic which will be generated through construction and operation of the development.

2. **Site Description**

- Description of the main reasons for the site selection and any alternatives in site design or layout which have been considered;
- Area of proposed land which the panels will occupy, clearly described and indicated on a map or diagram;
- Illustrated description of the land use of the surrounding area;
- Description of the policies plans and designations which are relevant to the site;
- Evaluation of the direct, indirect, secondary and cumulative, short medium and long term effects resulting from the existence of the development.

3. **Landscape Baseline Conditions**

- The current condition of the landscape;
- Use Newark and Sherwood Landscape Character Assessment to provide the framework landscape character information, supplemented by a study to assess the specific impact of the development;
- Relationship of the site to any designated areas of landscape at a national, regional or local level, and to areas of landscape value or scenic quality.
- Description of all baseline data sources, and methods used to supplement this information;
- The landscape baseline should be evaluated in relation to its sensitivity and importance. The sensitivity evaluation of each landscape element should reflect its quality value, contribution to landscape character and the degree to which the particular element or characteristic can be replaced or substituted.

4. **Predictions of Impact**

- Assessment of the scale, or magnitude of change to the landscape and visual elements as a deviation from the baseline conditions. Consideration will need to be given to visitor and resident populations, and seasonal variations;

- Provide a Zone of Theoretical Visibility (ZTV) diagram for the development indicating as a minimum 1km, 2km, and 4km radii from the site;
- The methods used to establish the magnitude should be clearly described and be appropriate and reasonable in relation to the importance of the landscape and visual impact;
- Where assumptions or unsupported data has been used in the predictions, these should be highlighted and accompanied by an indication of the reliability / confidence of those assumptions or data;
- Evaluation of the direct, indirect, secondary and cumulative, short medium and long term effects resulting from the existence of the development.

5. **Impact Significance**

- Clearly describe the judgements which underpin the attribution of significance;
- The assessment of significance should consider the impact's deviation from the established landscape baseline condition, the sensitivity of the landscape and receptors and the extent to which the impact will be mitigated or is reversible;
- The range of factors which are likely to influence the assessment of significance should be clearly identified;
- Provide detail of how these variables will affect the significance of the impacts over the life of the development;
- Identify the significance of impacts that remain following mitigation.

6. **Mitigation**

- Describe the measures proposed to avoid, reduce and if possible, remedy significant adverse impacts on both landscape character and visual amenity;
- Provide an indication of the effectiveness of the stated measures;
- Clearly indicate how the mitigation measures will be implemented.

7. **Presentation of the Landscape and Visual Impact Assessment**

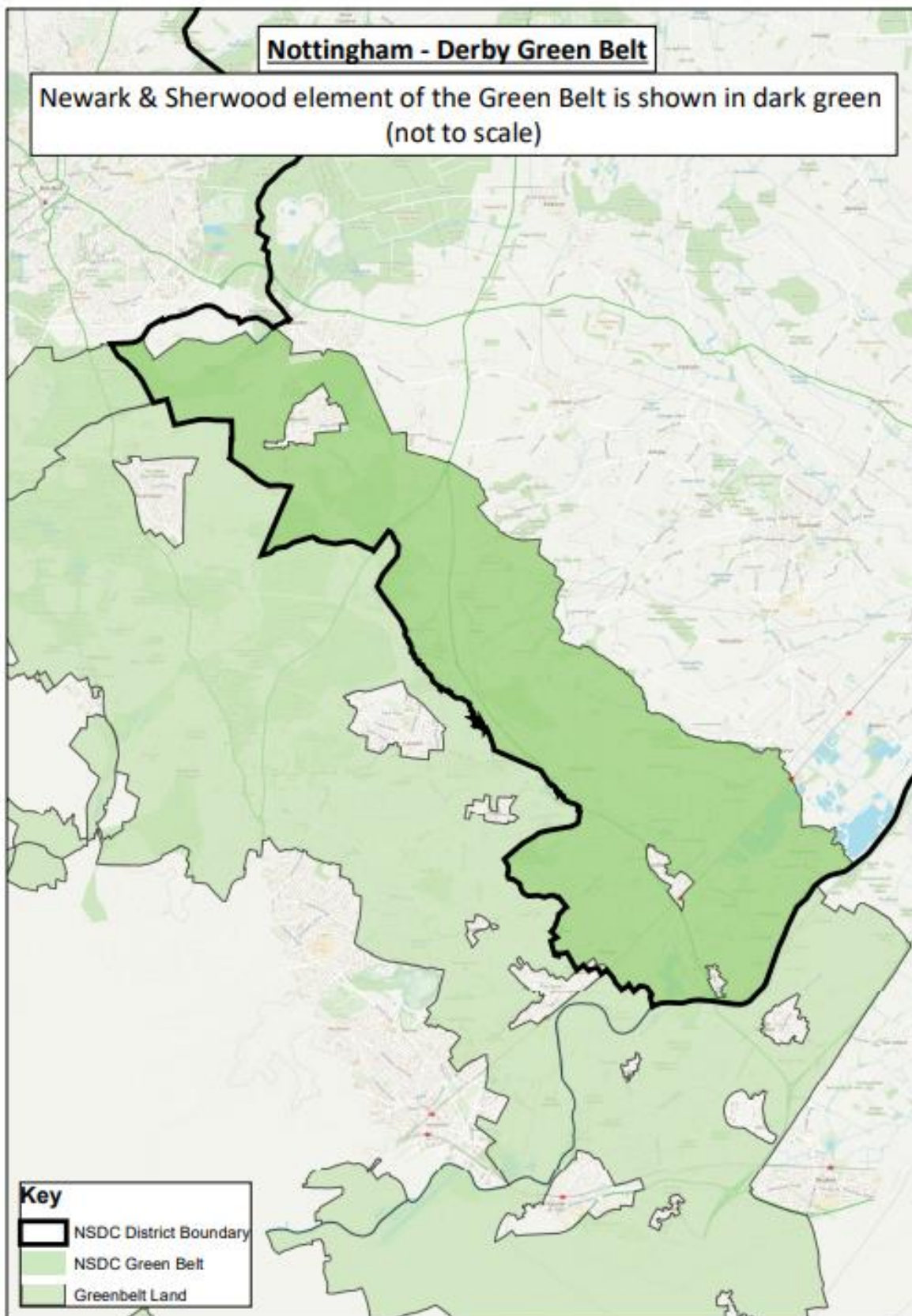
- The document should be clear and logical in its layout and presentation and be capable of being understood by a non-specialist;
- It should be a balanced document providing an unbiased account of the landscape and visual effects, with reasoned and justifiable arguments;
- A glossary of all technical terms and full reference list should be provided;
- Plans, diagrams and visual representations should be provided to assist in the understanding of the development and its impact, and should be clearly labelled with all locations reference in the text.

8. **Non-Technical Summary**

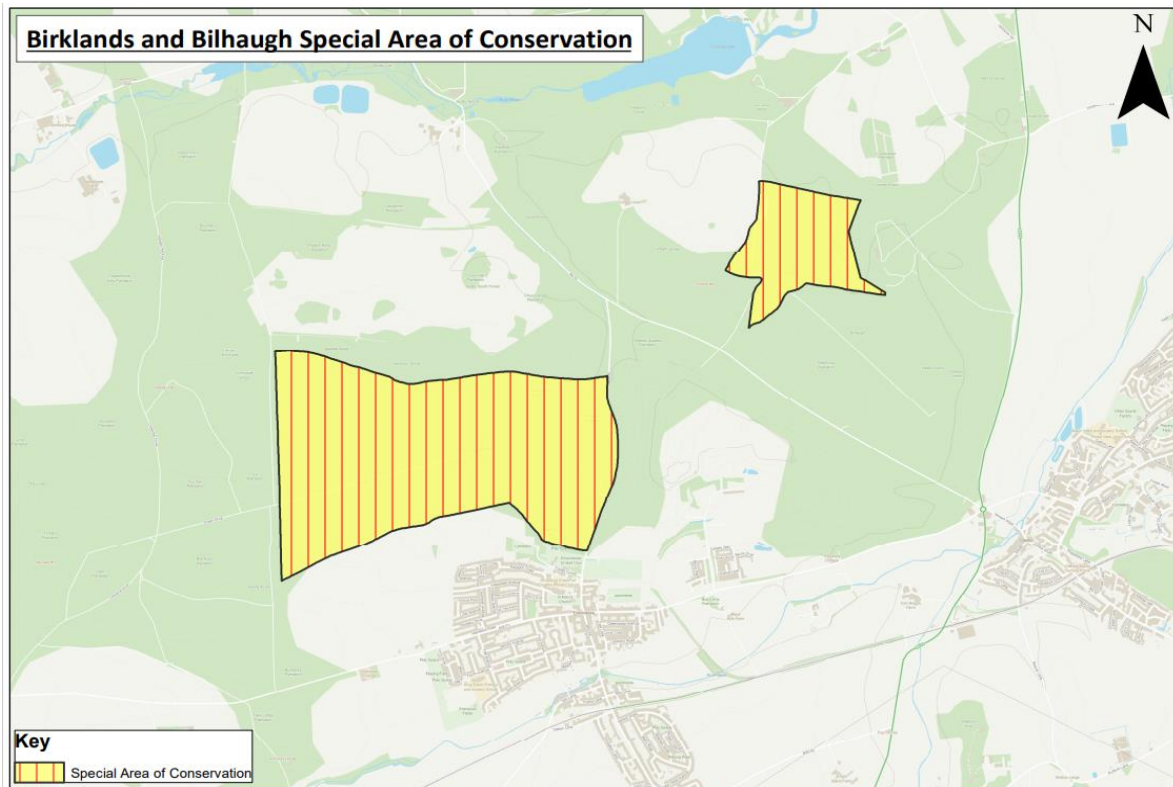
- A stand-alone document to be available to a non-specialist reader, to enable them to understand the landscape and visual impacts of the proposal;
- To include a summary description of the development; the aspects of landscape character and visual amenity likely to be significantly affected; the likely significant effects; the mitigations measures to be implemented;
- Include as a minimum the plans, maps and other visual representations which illustrate the location of the application site, the footprint of the development, and the location of key features.

Source: Appendix A of the BRE '[Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems](#)'

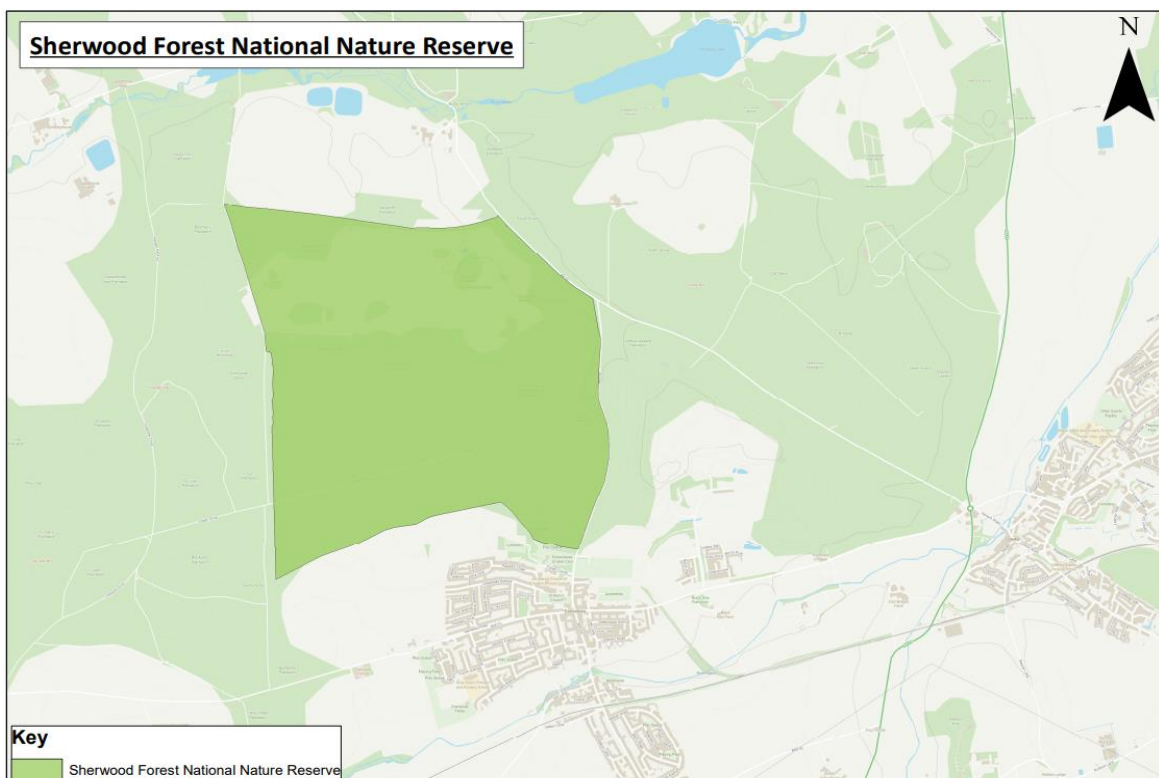
APPENDIX 2 – NOTTINGHAM – DERBY GREENBELT



APPENDIX 3 – BIRKLANDS & BILHAUGH SAC



APPENDIX 4 – SHERWOOD FOREST NNR



APPENDIX 5 – HISTORIC LANDSCAPE AROUND LAXTON



APPENDIX 6 - ENVIRONMENT AGENCY ADVICE ON BESS

Informative – General guidance for BESS developments

In line with [planning practice guidance](#):

- Applicants should engage with Local Fire & Rescue Services issues of siting and location of BESS are dealt with before applications are made. Ideally this should be done before submitting a planning application.
- Local planning authorities to refer to [guidance produced by the National Fire Chiefs Council](#) for consideration when determining applications and consult with local Fire & Rescue Services before issuing decisions.
- Applicants will also need to comply with relevant Building Regulations in [Part B](#). They require applicants to provide suitable access for the fire service.

Informative - Management of end of life industrial batteries

Battery energy storage systems (BESS) facilities are not regulated under the Environmental Permitting Regulations regime.

However, battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs.

Batteries have the potential to cause harm to the environment if stored inappropriately e.g. subject to a fire as the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation. The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place.

The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only.

Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.



Report to: Cabinet Meeting: 10 June 2025

Portfolio Holder: Councillor Claire Penny – Sustainable Economic Development

Director Lead: Matt Lamb, Director - Planning & Growth

Lead Officer: Matthew Norton - Business Manager, Planning Policy & Infrastructure Business Unit, Ext. 5852

Report Summary	
Type of Report	Open Report / Non-Key Decision
Report Title	Strategic Housing and Employment Land Availability Assessment
Purpose of Report	To present the draft Strategic Housing and Employment Land Availability Assessment ('SHELAA') Methodology Document Consultation Responses; and to agree the final methodology prior to carrying out a 'Call for Sites' exercise.
Recommendations	That Cabinet approve: <ul style="list-style-type: none"> a) the proposed consultation responses as set out in Appendix 1 to the report; b) the proposed final Methodology Document as set out at Appendix 2 to the report; and c) a 'Call of Sites' exercise to be undertaken in the Summer 2025.
Alternative Options Considered	Cabinet has already approved the production of a new SHELAA Methodology therefore no alternative options have been considered.
Reason for Recommendations	To allow the District Council to approve the SHELAA Methodology and undertake a 'Call for Sites' exercise.

1.0 Background

- 1.1 The draft document was discussed at the Council's Planning Policy Board on 25 February 2025 and Cabinet on 1 April 2025. It was agreed that the Council should consult on a new SHELAA methodology in order that site assessment work to inform the new Local Plan can be progressed following a 'call for sites' exercise.

- 1.2 The draft SHELAA Methodology was consulted on between 7 April 2025 and 19 May 2025. In total, 26 responses were received to the consultation. The SHELAA Methodology Post Consultation Statement, which details all responses and the Council's proposed response, is contained at **Appendix 1**.
- 1.3 Most respondents were supportive of the overall approach to the methodology and supportive of the exclusion of sites within Flood Zone 3 at Stage 1.
- 1.4 A number of respondents criticised the level and location of development in the District which falls outside the scope of this consultation. Decisions about site allocations are made in the plan-making process, and these decisions are informed by the SHELAA, evidence base documents and the results of community engagement. The SHELAA only advises how sites submitted to the 'call for sites' exercise will be assessed and does not determine where development may occur.
- 1.5 Several changes were made to the draft document to respond to the representations received which all comprised minor typos and amendments. A tracked changes version of the document can be viewed at **Appendix 2**.
- 1.6 A 'call for sites' exercise is proposed to be undertaken in Summer 2025. This is an exercise where the Local Planning Authority invites landowners, developers and the public to put sites forward for consideration in the new Local Plan to meet the future needs of the area. The sites submitted will then be assessed using the SHELAA Methodology.

2.0 Proposal

- 2.1 It is proposed that Cabinet approve the SHELAA Methodology and the proposed responses to consultation. This will enable site assessment work to inform the new Local Plan to be progressed following a 'call for sites' exercise in Summer 2025.

3.0 Implications

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate.

Financial Implications – FIN25-26/8716

- 3.1 No direct financial implications have been identified.

Legal Implications – LEG2526/860

- 3.2 Cabinet is the appropriate body to consider the content of this report.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

The Cabinet report of 1 April 2025 is published - <https://democracy.newark-sherwooddc.gov.uk/ieListDocuments.aspx?CId=288&MIId=1019>



Newark & Sherwood Local Plan

**Strategic Housing and Employment Land Availability Assessment –
Draft Methodology**

Statement of Consultation

June 2025

Contents

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1.0 Introduction

- 1.1 Newark & Sherwood District Council has prepared a draft Strategic Housing and Employment Land Availability Assessment ('SHELAA') Methodology.

Purpose of the Consultation Statement

- 1.2 This Statement of Consultation sets out the consultation, which was undertaken, and the responses received in relation to the SHELAA Methodology. The Statement sets out the following:
- i. The persons the local planning authority consulted when preparing the supplementary planning document.
 - ii. A summary of the key issues raised by those persons; and
 - iii. How those issues have been addressed in the supplementary planning document.
- 1.3 This report summarises the consultation process and sets out the feedback received. These comments helped to shape the amendments made to the final version of the SHELAA Methodology.

2.0 Early Engagement

- 2.1 The draft document was discussed at the Council's Planning Policy Board on 25th February 2025 and Cabinet on 1st April 2025. A final Draft of the document will be discussed at the Council's Planning Policy Board on 28th May 2025 and Cabinet on 10th June 2025.

3.0 Consultation

- 3.1 The consultation took place between the 7th of April and the 19th of May 2025, a period of 6 weeks. A total of 26 responses were received.
- 3.2 The District Council contacted various specific and general consultation bodies. An indicative list of groups is set out below.

Specific Consultees	General / Other Consultation bodies
County Council	Developers incl. House Builders
Neighbouring Authorities	Planning Agents
Town & Parish Councils / Meetings	Members of the Public
Environmental Bodies	
Highways England	
Network Rail	

- 3.2 All consultees received an email or letter by post setting out the period of consultation, where the documents could be viewed and the deadline for submitting comments (Appendix 1).
- 3.3 The Council published its Draft SHELAA Methodology document on its website and paper copies were made available at Castle House. The webpage included a copy of the document along with a copy of the representation form, which could be filled in electronically or printed and returned.
- 3.4 Notices were placed in the Local Press (Newark Advertiser, Nottingham Post, and the Mansfield Chad) inviting representations and information about the consultation was posted on the Council's social media platforms.
- 3.4 In response to the consultation the District Council received 26 representations, and a summary of the main issues raised and how they were addressed are included at Appendix 2.

4.0 Consultation Responses

- 4.1 In response to the consultation, the Council received 26 responses from individuals, groups or organisations in the first consultation which ran from 7th April 2025 to 19th May 2025. This included responses from:
- Local residents.
 - Parish Councils.
 - Statutory consultees (incl. Historic England & Environment Agency)
 - Organisations (incl. Nottingham Trent University & Millgate Conservation Society)
- 4.2 A summary of the responses received, and the Council's response are set out in Appendix 2. There have also been several other minor changes, typos, presentational amendments, and factual amendments / updates.

Issues Raised

- 4.3 In total, 26 responses were received from a range of respondents including statutory consultees, agents and parish councils.
- 4.4 Most respondents were supportive of the overall approach to the methodology and supportive of the exclusion of sites within Flood Zone 3 at Stage 1.
- 4.4 A number of typos were identified by respondents which have been addressed.
- 4.4 A number of respondents criticised the level and location of development in the District which falls outside the scope of this consultation. Decisions about site allocations are made in the plan-making process, and these decisions are informed by the SHELAA, evidence base documents and the results of community engagement. The

SHELAA only advises how sites submitted to the 'call for sites' exercise will be assessed and does not determine where development may occur.

How was the Document Changed?

- 4.4 Several changes were made to the draft document to respond to the representations received which all comprised minor typos and amendments. The Council's response to the consultation comments received can be viewed at Appendix 2.

5.0 Appendices

Appendix 1: Text of Email and letter sent to statutory consultees and consultees on the SHELAA database.

Appendix 2: Consultation Responses and LPA Response

Appendix 1: Text of Email sent to statutory consultees and consultees on the SHELAA database.

Dear Consultee,

Strategic Housing and Employment Land Availability Assessment – Draft Methodology Consultation

The District Council has published a Draft Methodology for the Strategic Housing and Employment Land Availability Assessment ('SHELAA') for consultation, and we are inviting representations to be made on this document.

We are working towards the preparation of a new Local Plan, which, once adopted, will guide future growth and development in the District and supersede the current Local Development Framework.

This report sets out the Council's methodology for undertaking the SHELAA and is proposed to update and replace the methodology we have previously used. The methodology has also been updated to reflect changes to national planning policy.

Once adopted, the Methodology will be used by the Council to undertake assessments of sites put forward for consideration for either housing and / or employment purposes.

We are now seeking your views on the draft Methodology for a period of six weeks, from 7th April 2025 to 19th May 2025.

The Draft SHELAA Methodology can be viewed on the Council's website at:

<https://www.newark-sherwooddc.gov.uk/shelaa/>

Please submit your responses online using our consultation site. If you are unable to comment online, please get in touch by calling 01636 650000 or emailing planningpolicy@newark-sherwooddc.gov.uk

Kind regards,

Appendix 2: Main Issues Raised by Public Consultation and LPA Response

Each of the questions are set out below. Responses are summarised and the Council has responded to each comment directly in the table below. The consultation responses summary does not include the personal details of private individuals. Nine respondents wish to be notified when the 'Call for Sites' exercise opens.

Question 1: Do you have any comments on Chapter 1 (Introduction) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
004 – Witham IDB	Upper Witham Internal Drainage Board's district covers areas to the South, East and North East of Newark. Maps or shapefiles are available on request.	Comments noted.
008 – Cllr Johno Lee	<p>The document should reflect the reality that areas such as Lowfield Lane and Fernwood have already accommodated substantial development and should not be earmarked for further major growth. These communities have absorbed more than their fair share of housing delivery in recent years, and any future strategic allocations should now be focused elsewhere in the district where infrastructure and community capacity allow for it.</p> <p>In the case of Middlebeck, development should remain within the scope of existing outline planning permissions. As much green and open space as possible should be delivered early as a priority, to meet the expectations of residents and maintain quality of life. There must be no future encroachment onto surrounding farmland or greenfield land near Fernwood and Lowfield Lane. These spaces should be safeguarded entirely. The SHELAA must be clear that previously allocated or speculative development sites in these locations are no longer appropriate for expansion.</p>	Comments noted. These comments relate to the Local Plan Spatial Strategy, not the SHELAA Methodology. Therefore, they are outside of the scope of this report.
010 - Nottinghamshire Wildlife Trust	We welcome a strategic approach to screening potential areas for housing and employment allocation and hope that it will be a mechanism that avoids designated sites of wildlife value, including Local Wildlife Sites (LWS), being allocated for housing to ensure that there is no net loss of biodiversity in the district.	Comments noted. The Local Nature Recovery Strategy will be fully considered and integrated in the SHELAA as and when the document has been finalised.

Respondent ID / Organisation	Summary of Comment	Response / Action
	<p>1.8 states: ‘The SHELAA is a ‘live’ document, and any information is correct at the time of publication. Any subsequent changes, such as the results of Local Nature Recovery Strategy, will be integrated as appropriate.’ The Local Nature Recovery Strategy should be fully considered and integrated within the SHELAA and subsequent Local Plan for Newark & Sherwood District Council to aid nature’s recovery and for the health and well-being of residents. Local Nature Recovery Strategies (LNRSS) are a new England-wide system of spatial strategies established by the Environment Act 2021.</p> <p>The main purposes of these strategies are to:</p> <ul style="list-style-type: none"> • Help reverse the ongoing decline of nature in England by establishing priorities for nature recovery. • Identify locations to create or improve habitats that are most likely to provide the greatest benefit for nature and the wider environment. • Inform the delivery of mandatory Biodiversity Net Gain (BNG) and guide local planning policy for nature recovery. <p>Key elements include:</p> <ul style="list-style-type: none"> • Biodiversity Priorities Statement: identifying priorities for nature's recovery. • Local Habitat Map: mapping the most valuable existing areas for nature. • Specific Proposals Map: highlighting habitat creation or wider environmental improvement goals. <p>The Strategic Significance Policy is an interim policy setting out how strategic significance should be applied to habitats within BNG calculations supporting planning applications before the Nottinghamshire Local Nature Recovery Strategy is published. The Strategic Significance - Focal Areas Plan identifies locations where it is considered that there are concentrations of opportunities for habitat creation and where it is considered that activities for habitat creation and enhancement could be prioritised to provide maximum biodiversity benefits.</p>	Comments noted.
		Comments noted.
P13 – Resident	Public consultation should take place at assessment stage, just because sites are identified they should not automatically be assessed and subsequently allocated.	Comments noted. National guidance requires all sites submitted to the SHELAA to be assessed unless

Respondent ID / Organisation	Summary of Comment	Response / Action
		screened out at Stage 1. Public consultation will take place once the assessment has been completed as part of the Local Plan consultation.
015 – Fytche-Taylor Planning c/o NTU	No specific comments. The intention behind revising the SHELAA Methodology is clear.	Comments noted and welcomed.
019 – Environment Agency	We are pleased to see that "Sites within Flood Zone 3" are included within the "Exclusion Criteria for Stage 1".	Comments noted and welcomed.
025 – Resident	Yes. As well as avoiding sites that physically exist in Flood Zone 3, is it vital to assess whether development of sites that themselves do not flood would increase the risk and impact of flooding in other sites. This impact needs to be considered so the current flooding situation in Lowdham and other areas is not made unintentionally worse by new development. So specifically, it is not just sites in Flood area 3 but sites in other Flood areas where development would have a knock on effect.	Comments noted. National policy requires that any development should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 170).

Question 2: Do you have any comments on Chapter 2 (NPPF Context) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
008 – Cllr John Lee	The NPPF guidance must be applied with local knowledge at its core. Areas such as Fernwood, Middlebeck, and Lowfield Lane have already absorbed significant growth and should no longer be treated as default options for further development. Future site identification must focus on underused areas elsewhere in the district. Critically, officers must recognise that elected members—who live in and represent these communities—bring deeper, real-world understanding of local impact. Their views must carry more weight than detached assessments. Officers are there to advise, but members are democratically accountable and grounded in local reality.	Comments noted. Site identification will be informed by the Spatial Strategy identified as part of the Local Plan process and is therefore outside the scope of the SHELAA Methodology. Production of the Local Plan is overseen by Planning Policy Board, Cabinet and ultimately Full Council.
013 – Resident	The gathering of information on identified sites should not just be desktop exercises.	Comments noted. All sites being assessed will be subject to a site visit and consultation with key stakeholders (such as the Highways Authority).
015 – Fytche-Taylor Planning c/o NTU	The intention behind revising the SHELAA Methodology is clear and NTU welcomes the alignment with the approach set out in national planning policy and guidance to assess sites for the development of a new Local Plan.	Comments noted and welcomed.
018 – Balderton Wildlife Facebook Group	<p>Consideration should be given towards areas of greenspace deprivation by making reference to social access to green space as provided by Natural England's Greenspace infrastructure mapping tool insert ref – https://designatedsites.naturalengland.org.uk/GreenInfrastructure/map.aspx</p> <p>This is particularly important in improving limited access to green spaces within 15 mins walk as is a key target of government policy under the Environment Improvement Plan.</p>	Comments noted but this is outside the scope of the Methodology Report and will be considered at the next stage in the SHELAA process and through the production of the Local Plan.

Question 3: Do you have any comments on Chapter 3 (Methodology) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
005- Lincolnshire County Council	The proposed SHELAA methodology document is acceptable in highways and flood risk terms, it describes a standard RAG assessment of sites which will be used and that Officers will then make a decision of sites to be taken forward.	Comments noted and welcomed.
008 – Cllr Johno Lee	The methodology may follow PPG guidance, but its application must be rooted in local understanding. Areas like Fernwood, Middlebeck, and Lowfield Lane are already overdeveloped, and any process that still considers them viable broad locations risks repeating past planning mistakes. Methodology must include meaningful weight for the insight of elected members and local residents. Officers may follow policy, but members and residents live with the consequences. Their voices must be central—not secondary—to site assessments. In cases of conflict, local knowledge and community feedback should take precedence over generic national assumptions.	Comments noted. Site identification will be informed by the Spatial Strategy identified as part of the Local Plan process and is therefore outside the scope of the SHELAA Methodology.
013 – Resident	Assessment should include local water table data, not incorrect outdated reports from EA. If the ground levels need to be raised to overcome flood risk, then sites should be declined, raising land levels is not acceptable as this exacerbates the problems at lower level ground.	Comments noted. All types of flood risk are considered as part of the Local Plan process through the Strategic Flood Risk Assessment. National planning policy requires that any development should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 170).
004 - Witham IDB	Generally, Newark & Sherwood DC have the appropriate policies with regard to flood risk and land drainage.	Comments noted and welcomed.
015 – Fytche-Taylor Planning /o NTU	NTU supports the decision to now base the SHELAA on the administrative boundary of NSDC instead of the wider Housing Market Area (HMA). Delivery rates have varied considerably across the HMA and the previous approach did not allow for local variations. Greater understanding with a more localised context will allow improved flexibility in the site selection process and better reflects the rural nature of the district than a singular approach better suited to the more urban areas	Comments noted and welcomed.

Question 4: Do you have any comments on Chapter 4 (Stage 1: Site Identification) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
005 – Lincolnshire County Council	Lincolnshire County Council would welcome the opportunity to be involved with the assessment of any large sites near to the district's border with Lincolnshire, which could have an impact on LCC infrastructure.	Comments noted.
006 – Resident	Complete transparency of sites should be provided to all individuals on the self-build register. Give people the opportunity to see and purchase land suitable for self-build without corporate buyouts who just sell for profit.	Comments noted. All submitted sites will be published on the Council's website as part of the SHELAA process.
007 – Millgate Conservation Society	<p>Flooding - large areas of our locality are designated as Flood Zone 2 and Flood Zone 3. We notice that 'Sites within Flood Zone 3' are excluded from Stage 1. (See 'Newark and Sherwood Local Development Framework, Strategic Housing and Employment and Viability Assessment Draft Methodology' Para 4.10 Table 2: Exclusion Criteria for Stage 1). Does this mean they will not be assessed?</p> <p>Small sites - sites with capacity less than 5 dwellings and 0.25ha (employment) are excluded from the Stage 1 assessment. (See 'Newark and Sherwood Local Development Framework, Strategic Housing and Employment and Viability Assessment Draft Methodology' Para 4.9 Table 2: Exclusion Criteria for Stage 1) The character of our area is largely formed of very small developments and exclusion from Stage 1 would be a serious omission.</p>	<p>Any site within Flood Zone 3 will be excluded from further assessment and thus will not be considered any further in terms of its development potential.</p> <p>Sites with capacity of less than 5 dwellings for residential or 0.25ha for employment is the recommended threshold in the Government's Planning Practice Guidance. This will not stop small sites within the settlement boundaries coming forward through the planning application process.</p>
008 – Cllr Johno Lee	The site identification process must have integrity. The Council cannot act as both promoter and assessor of land in key areas like Fernwood, Middlebeck and Lowfield Lane—doing so amounts to checking its own homework. There must be a clear distinction between what the Council approves and what it later develops or supports through joint ventures. Residents have long faced wave after wave of growth, and trust is wearing thin. Sites already approved must be built out before anything new is considered. Communities need protection from speculative sprawl and reassurance that the process is fair, transparent, and free from conflict of interest.	<p>The Local Planning Authority (LPA) through the SHELAA process seeks to ensure it has a fuller understanding as possible of the land supply position in the District. This allows the LPA to most appropriately make judgements about the scale and location of growth in the District. This process is separate from a Council's role as a landowner.</p> <p>The best protection against 'speculative sprawl' is an up-to-date Local Plan prepared by the LPA which meets identified housing need.</p>

009 – Historic England	<p>We welcome Scheduled Monuments (SM) forming part of the exclusion criteria for Stage 1 assessment work (Table 2, page 6). In our experience inclusion of SM's as part of Local Plan site allocations has resulted in additional work and/or subsequent deletion from plans so we are supportive of the proposed approach. We anticipate that any SM setting impacts would be considered as part of Stage 2 assessment work.</p>	<p>Comments noted. It is agreed that any SM setting impacts will be considered as part of subsequent assessment work (where relevant).</p>
010 - Nottinghamshire Wildlife Trust	<p>Potential sources used to collate the SHELAA sites are listed in Table 1. The SHELAA will be a key document in the new Local Plan, and it should be linked to the district 's Green Infrastructure Strategy (February 2010), which isn't included. The Strategy has been produced to respond to the need to plan for predicted growth, to enhance quality of life and to ensure environmental sustainability for many years to come. This Strategy allows for the growth of settlements whilst ensuring that the district's assets and landscapes suffer no negative effects and instead prosper from new development. The strategy states: 'Whilst new development is the main driver, the need for a high level of environmental quality, provision of recreational opportunities and access to green space, and the need to respond to the threats and challenges of climate change for communities and wildlife has also shaped the Strategy's development. The GI Strategy should be used to inform the location of housing and employment development. Had the strategy been referenced, a red flag would have been raised in relation to proposed development at Hawton and Fernwood. Part of that area is designated as a Biodiversity Protection & Enhancement area. Key actions include creating an open access 'natural corridor' along the Middle Beck/Shire Dyke and the area of Fernwood development within Flood Zone 3; refrain from allowing development directly within this area and develop a series of LNRs.</p> <p>4.10 states that several national and local designations have informed the Stage 1 assessment, including Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves. We advocate that Local Wildlife Sites (LWS) should be included. There should be a presumption against development of and damage to sites of local biodiversity value. LWSs, are a local, non-statutory designation, that sit below (but complements) statutorily</p>	<p>Comments noted. The LPA will be looking to update the Green and Blue Infrastructure evidence base as part of the Local Plan process. The site assessment form will also include a section on green and blue infrastructure.</p> <p>The current strategic site allocations were informed by the Green Infrastructure Strategy; indeed, the strategic site policies reference the requirement to address the Middlebeck / Shire Dyke Corridors. Subsequent planning consents have secured significant green infrastructure improvements along these corridors.</p> <p>Comments noted. It should be noted that this list is not exhaustive, but reference to Local Wildlife Sites will be included.</p>

	<p>designated SSSIs. They are of substantive value for the conservation of biodiversity and are home to rare and scarce species or represent the best surviving examples of habitats that were once widespread and typical of the Nottinghamshire landscape. Collectively, these sites form an essential ecological network and act as wildlife corridors and stepping stones, allowing species to migrate and disperse between sites. The continued existence of these sites is vital to safeguard wildlife from the pressures of development, intensive agriculture, and climate change. The LWS network is comprehensive (meaning that every site which qualifies as an LWS is designated as one), whereas SSSIs are representative of the best sites in an area, such that that not all sites which meet the SSSI selection criteria have been, or will be, designated as a SSSI. Because of this, several LWS would potentially qualify as SSSIs, meaning that LWS are best described as sites that are of at least county-level importance for their flora and/or fauna. Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, have a fundamental role to play in creating Nature Recovery Networks (NRN) and contributing to the quality of life and the well-being of the community. The aim should be to protect and enhance the natural environment and biodiversity by ensuring all new development does not have a negative impact, but a positive benefit for biodiversity.</p> <p>The NPPF Section 192 states: <i>To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity.</i></p> <p>The District Council will carry out a ‘Call for Sites’ exercise in 2025 to provide landowners and developers an opportunity to submit their sites. The exercise will seek information on the site including environmental information. As a minimum, when considering protected species, the district should require comprehensive and up to date ecological information if the screening process relies solely on a desk top study. Data sets are rarely comprehensive, and a paucity of information typically relates to a lack of recording effort, which can be</p>	<p>Whilst the Council won’t require an ecological appraisal at ‘call for sites’ submission stage, however these matters will be considered as part of the Local Plan process. It is considered that when submissions are reviewed, sufficient information would be available from desk-based assessment and site visits</p>
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	<p>misinterpreted as absence. Ideally, before land is submitted for consideration the landowner/developer would employ an ecologist to undertake a Preliminary Ecological Appraisal (PEA). The PEA is normally produced to inform a developer (or other client), and their design team, about the key ecological constraints and opportunities associated with a project, possible mitigation requirements and any detailed further surveys required to inform an Ecological Impact Assessment (EcIA). Under normal circumstances it is not appropriate to submit a PEAR in support of a planning application because the scope of a PEAR is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species. In most cases, additional surveys beyond the PEA will be required. This approach would benefit the developer as they would understand the potential ecological impact/constraints of proposed developments on their site at an early stage and help to inform their decision to continue or not with the process.</p> <p>Exclusion Criteria for Stage 1 states that designated sites including SACs, SSSI, LNRs and Ancient Woodlands will be excluded from development. However, 4.12 states <i>'Where only part of a site falls within any of the criteria above, a judgement will be made whether to include the site in the SHELAA and the developable area will be reduced.'</i> These statements appear to be contradictory.</p> <p>Section193 of NPPF states: <i>'b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest'.</i></p>	<p>to understand when more detailed ecological information would be needed.</p> <p>Commented note. Paragraph 4.12 clearly states that these sites would be excluded from being developed.</p>
13 – Resident	Any land identified and assessed as "valuable" in respect of greenspace or biodiversity, insist a move to protect this, enhance it, designate it.	Comments noted. Any impact on greenspace or biodiversity will be considered during the assessment process.
15 – Fytche-Taylor Planning Co NTU	We support the inclusion of sites with potential for new settlements. Assessing them on merit including contributions to sustainable growth and housing needs	Comments noted and welcomed.

	<p>is essential. The revised approach relieves pressure on existing settlements and infrastructure while enabling discussions on new locations instead of concentrating growth in the same areas. Previously, viable sites like Brackenhurst Campus were excluded despite having a strong nucleus for development.</p> <p>This aligns with the Government's vision for new towns, allowing consideration of alternative growth locations. Southwell, for example, faces housing demand but has limited capacity due to its built form, heritage, and environmental distinctiveness. A new settlement nearby could provide economic and social benefits without straining infrastructure.</p>	
016 – Southwell Civic Society	<ul style="list-style-type: none"> • Para 4.10 Table 2 – We think sites which are only partially within Flood Zone 3 should also be excluded. • Para 4.13 – This may apply on a District wide basis but is not appropriate for individual parishes. 	<p>Comments noted. Sites which are partly in Flood Zone 3 will not be immediately discounted and will be subject to a full site assessment before a final and evidenced decision can be made. Otherwise, there is potential to be excluding a number of sites where there is less than 1% is in Flood Zone 3 without a full assessment.</p> <p>Paragraph 4.13 will be determined through the Local Plan process and is outside the scope of this consultation.</p>
017 – Resident	Please consider In your meeting: 1. Sewage 2. NSDC open space strategy, 3. Flood zone 2 4. The importance of open breaks between settlements 5. Presence of special scientific site's which needs to be changed to Presumption against	Comments noted.
018 – Balderton Wildlife Facebook Group	<p>1. Flood Zone 2 should be included as a likely exclusionary criterion since the Environment Agency classification is often (in our experience) out-of-date, against a background of climate change presenting ever extreme flooding events. At present Flood Zone 3 is the only exclusionary criterion now.</p> <p>2. The importance of Open Breaks between settlements. For Balderton a defined Open Break between the East Coast mainline railway and Clay Lane and an Open Break south of the existing housing line and the Southern Link Road are both crucial</p>	<p>The Council considers this to be too restrictive and would like to see sites within Flood Zone 2 fully assessed before an evidenced decision is made on whether to exclude a site. This approach is in line with National Planning Policy.</p> <p>Comments noted in regard to open breaks, but consideration and / proposal of any new designations is beyond the scope of this document.</p>

	<p>3. Presence nearby of Sites of Special Scientific Interest, which can include sites sensitive for wildlife or natural protection such as local wildlife sites, (LWS) : instead of saying that these will be "carefully considered" the criterion should be changed to a "presumption against".</p>	<p>These are important designations and any sites for development within these designations will be excluded. Any sites adjacent to these designations will be carefully considered at Stage 2 where the full impacts can be assessed.</p>
022 – Norwell and Norwell Woodhouse Parish Council	<p>In relation to Stage 1, Members considered that the entry within Table 1 in relation to planning applications that have been refused, should be amended to read 'land should not be considered'.</p>	<p>Comments noted. The Council does not wish to exclude these sites from full assessment in order to understand why they were refused and if the reason for refusal can be overcome (such as lack of adequate documentation).</p>
026 – Balderton Parish Council	<p>Environment Agency floodzone3 data is out of date and unreliable. Floodzone2 must be considered. Severn Trent Water have more recent data on flooding & sewage capacity.</p> <p>It is essential the capacity for sewage (of the local water providers) is assessed before allocating any land for housing/employment. If there isn't capacity for the combination of allocated housing sites the infrastructure requirements for drainage must be considered before planning permission is granted.</p> <p>STW should be a compulsory consultee. They must be able to assess drainage capacity to ensure homes are not subjected to sewage flooding when the capacity of pumping stations has not been increased in line with housing developments.</p> <p>4.10 'careful consideration' of sites next to SSSIs – careful consideration could be interpreted to meet the requirements of the landowner/developer - there should be presumption against using sites adjacent to SSSIs or a fixed buffer zone.</p>	<p>Comments noted. All types of flood risk are considered as part of the Local Plan process through the Strategic Flood Risk Assessment. National planning policy requires that any development should be made safe for its lifetime without increasing flood risk elsewhere (Paragraph 170).</p> <p>Severn Trent Water are already a statutory consultee.</p> <p>The Council will be carefully considering all sites adjacent to SSSIs and similar designations in line with national planning policy.</p>

Question 5: Do you have any comments on Chapter 5 (Stage 2: Sites / Broad Location Assessment) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
004 - Witham IDB	Larges areas of the allocation 'Land around Fernwood (NAP 2C)' is at flood risk and in Zones 2/3 on the Environment Agency Flood Maps. The Board has a standing objection to development in flood plain and consideration should be given to whether development should be permitted here and if it is appropriate mitigation should be implemented. It is also noted that the site SP3 / DM8 in Harby has been removed as unsuitable.	Comments noted. These comments are outside the scope of the SHELAA Methodology document and relate to existing land allocations in the adopted Local Development Framework.
007 – Millgate Conservation Society	Conservation - How does our designation as a Conservation Area affect the Assessment of our locality? (See 'Newark and Sherwood Local Development Framework, Strategic Housing and Employment and Viability Assessment Draft Methodology' Para 5.11) This refers to 'Suitability Factors' but seems to omit reference to Heritage Assets. We regard this as a serious omission which will have a significant negative effect on our locality.	Heritage assets are encompassed in the last bullet point entitled ' <i>impact of landscape and biodiversity and historic environment</i> '.
008 – Cllr Johno Lee	The assessment framework is detailed, but it risks treating development as a technical exercise rather than a lived experience. Sites in Fernwood, Middlebeck, and Lowfield Lane should not pass suitability or achievability checks without full recognition of cumulative community impact. High-volume past approvals should trigger caution, not justify more. Achievability must not be judged in isolation from public resistance, infrastructure fatigue, and broken promises on green space. The traffic light system is only as honest as the values behind it—residents must not be sidelined by 'green' ratings that ignore their reality. Councils must assess social acceptability as seriously as land metrics. Otherwise, public trust collapses	Comments noted. This is a technical exercise to inform Plan-making. Decisions about site allocations are made in the plan-making process, these decisions are informed by the SHELAA, evidence base documents and the results of community engagement.
009 – Historic England	We welcome consideration of impacts for the historic environment forming part of the Stage 2 assessment work as part of the proposed methodology. We would recommend that the five steps for assessment set out in Historic England Advice Note 3 are made use of as part of historic environment work (link). It is noted that the Stage 2 assessment work will consider achievability (delivery in the envisaged timescales) as well as density. We welcome the potential for flexibility	Comments noted. A reference to heritage assets will be made to Paragraph 5.21(c).

	around density set out in Para 5.20. In our experience the quantum of development being achievable within the context of heritage impacts, including setting impacts, is sometimes unclear as a Plan progresses. It is our preference to address issues at early stages of the Plan process to avoid delays later on in the process. As such, we recommend that 'impacts on the significance of heritage assets, including setting,' is included with the other identified constraints at Paragraph 5.21 criteria c for the avoidance of doubt.	
010 - Nottinghamshire Wildlife Trust	Section 5.11 states that officers will make a judgement as to the site's overall suitability with reference to several factors including impact of landscape and biodiversity and historic environment. Our concern with this approach is that when considering protected species, the information needs to be comprehensive and up to date if the screening process relies solely on a desk top study. Data sets are rarely comprehensive, and a paucity of information typically relates to a lack of recording effort, which can be misinterpreted as absence. All sites that are potentially suitable for protected species will require an Ecological Impact Assessment (EclA) prior to any planning decision to ensure that protected species are properly considered in the planning process. We note in the SHELAA report (2023) under Landscape, Biodiversity and Built Heritage Constraints we do not see a reference to the list of habitats and species of principal importance in England, which includes 56 habitats and 943 species first identified as priority habitats and species in the UK Biodiversity Action Plan (UK BAP). The list is for public bodies to help them meet their 'biodiversity duty' to be aware of biodiversity conservation in their policy or decision making. Publishing the list is a legal duty under Section 41 of the Natural Environment and Rural Communities (NERC) Act.	<p>Comments noted. The SHELAA is a technical assessment and any sites that are potentially suitable for protected species will require an Ecological Impact Assessment prior to any planning decision.</p> <p>The document will be amended to reflect the statutory duty to conserve and enhance biodiversity.</p>
13 – Resident	Sites should not be deemed as suitable or may be suitable without thorough assessment.	Sites will only be determined as suitable, may be suitable or not suitable once the full assessment process and site visits have been undertaken unless screened out at Stage 1.
14 – Resident	The last bullet point of 5.11 should stated Impact on..... replacing Impact of.....	Comments noted. An amendment will be made to reflect this comment.

	<p>The "Policy considerations" need expanding so the factors to be considered when assessing suitability are known. For example, Open Breaks, Conservation Areas, Conservation Area Appraisals etc.</p> <p>Other factors to be included potentially affecting suitability and achievability are:</p> <ul style="list-style-type: none"> - Legal agreements - Covenants affecting use of land - Traffic congestion - Access to highways <p>Last row of Table 3: Density Assumptions should read "where a single end user" to replace "where a singer end user"</p>	<p>Comments noted. Conservation Areas and their appraisals are captured under historic environment, but a reference has been made to Open Breaks under policy considerations.</p> <p>Traffic congestion and access to highways is captured under physical constraints.</p> <p>Reference to covenants will be included in '<i>identified constraints</i>'.</p> <p>Legal agreements will be included in '<i>information taken from 'call for sites' form</i>'.</p> <p>Amendment has been made to reflect comments regarding Table 3.</p>
015 – Fytche-Taylor Planning c/o NTU	<p>We support the traffic-light system for site assessments, which enhances clarity and consistency. However, it should be clarified whether missing constraint information automatically results in a 'red' classification.</p> <p>Consideration should also be given to constrained land—such as flood-risk areas or protected views—that can contribute positively to development by providing habitat creation, BNG areas, or public open space.</p> <p>We support the minor adjustments to site suitability criteria but emphasize the need to consider sustainability potential, as its exclusion could disadvantage new settlements despite their merits.</p> <p>While density assumptions remain unchanged, the inclusion of the Biodiversity Gain Hierarchy as a constraint is a positive step. Proper on-site planning and recognition of land-take requirements will ensure balanced development outcomes.</p>	<p>No, if there is missing information then this would result in an 'orange' classification where further work or information would be required.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted and welcomed.</p>

	We fully support the inclusion of locally informed assumptions on build-out rates and lead-in times.	Comments noted and welcomed.
016 – Southwell Civic Society	<ul style="list-style-type: none"> Para 5.15 – A detailed assessment of each SHELAA site must be made. Statutory consultees such as the Parish (or Town) Council, Local Lead Flood Authority and Highways Authority must be consulted as should local specialist organisations such as the Flood Forum, Civic Society and Community Archaeology Group. 	Comments noted. Once sites have been assessed they will be published on the Council's website and a period of consultation will be undertaken alongside the Local Plan process.
017 - Resident	<p>Consideration should be given towards social access of green space deprivation by social access to green as Natural England's Greenspace infrastructure mapping tool (link).</p> <p>Improving limited access to green spaces within 15 mins walk as is a key target of government policy under the Environment Improvement Plan.</p> <p>I am against development of sites that have great potential to provide ecosystem services such as natural flood management (NFM), flood storage, wildlife, services.</p> <p>This is particularly important in improving limited access to green spaces within 15 mins walk as is a key target of government policy under the Environment Improvement Plan.</p> <p>Strong presumption should be given against development of sites that have great potential to provide ecosystem services such as natural flood management (NFM), flood storage, wildlife corridors to ensure biodiversity connectivity as Government. These areas also provide other social benefits such as mental health and keep fit.</p>	Comments noted. Sites will be assessed considering the Open Space Assessment & Strategy. The natural environment will also be considered as part of this assessment. Consideration of these issues will be in line with the requirements of national planning policy.
018 – Balderton Wildlife Facebook Group	1. Sewage treatment capacity (pipes and sewage works) needs to be a criterion when land is identified for housing development. The confirmed hydraulic overloading of Balderton Sewage works and consequent foul sewer flooding of properties demonstrates that allocation should not be made where foul sewer capacity is not available	Comments noted. A reference will be made to sewerage capacity.

	<p>2. NSDC's Open Space Strategy document should be a criterion too, so that any new housing isn't detrimental to any existing shortfall in the parish for youngsters' play areas, amenity green space, allotments, playing fields etc. Where there is a particular deficiency in accessible greenspace provision as is the case in Balderton, which has the lowest greenspace provision per capita of the district further weighting of this factor should be given to balance against further deterioration and loss of greenspace</p>	<p>Comments noted. The criterion 'proximity and access to green spaces' encapsulates the Open Space Assessment & Strategy as a key evidence base document.</p>
026 – Balderton Parish Council	<p>5.11 Impact on landscape, biodiversity and historic environment should be the primary factor (not last).</p> <p>5.11 Should also consider sewage capacity</p> <p>This section should also take into account N&SDC's play pitch/open space strategy findings. If there is already a shortfall of play pitches/open spaces, any land in that parish should not be allowed to be redesignated for housing/employment land if there is already a shortfall in the area. More housing/employment land would only increase the deficit. Planning needs to be based on up-to-date data.</p> <p>(E.g. Balderton already has a 254 across shortfall of play pitches/open spaces – more development will only increase this).</p> <p>Natural breaks between settlements need to be considered.</p>	<p>Comments noted. The list is neither exhaustive nor in order of priority.</p> <p>Comments noted and bullet point amended.</p> <p>Comments noted. This is encapsulated in the bullet point 'proximity and access to green spaces'.</p> <p>Comments noted.</p>

Question 6: Do you have any comments on Chapter 6 (Stage 3: Windfall Assessment) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
007 – Millgate Conservation Society	<p>Vacant sites and vacant buildings - new uses? We are most concerned that a 'Windfall allowance' will not be included in relation to employment land supply. (See 'Newark and Sherwood Local Development Framework, Strategic Housing and Employment and Viability Assessment Draft Methodology' Para 6.5). A steady depletion of properties used for employment over the years has resulted in a change of our locality from a vibrant mixed use neighbourhood, to mostly residential. This is contrary to the spirit of the 'Millgate Plan' (see below).</p> <p>The Millgate Plan - The plan established under the 'Millgate Revival' guided development when the Conservation Area was established and the plan for dualling Millgate was abandoned. Will the spirit of that plan which established principles of housing and small-scale employment permeate this assessment?</p>	<p>Windfall allowances are typically only used for housing supply.</p> <p>The purpose of the Methodology Document is not to set policy, but to assess the suitability of sites for development.</p>
008- Cllr Johno Lee	<p>Windfall sites should not be used as a blanket justification for additional development in already saturated areas like Highfield (Balderton) and Lowfield Lane. This approach risks undermining proper planning scrutiny. Just because an area has delivered in the past does not mean it should continue to absorb growth indefinitely. Windfall allowances must not load pressure onto communities that have already borne the brunt of large-scale expansion. Each proposed site should be assessed on its own individual merits, with genuine local input. Windfall status should never override site-specific impacts or the wider planning context.</p>	<p>Windfall sites are sites which come through the planning system that are not allocated in a Development Plan. The NPPF (2024) permits Councils to include an allowance for windfall development.</p> <p>It states at Paragraph 75 that 'where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.' Based on our local evidence since 2013/14, 53% of all housing completions comprise of windfall sites. A windfall allowance is not used in the supply of employment land.</p>
015 – Fytche-Taylor Planning for NTU	<p>Unlike the previous approach, the SHELAA will now include a windfall allowance, recognizing the significant role windfall sites play in the District's housing supply.</p>	<p>Comments noted and welcomed.</p>

	We support this change, as windfall development can make a valuable contribution to overall housing provision, helping to meet demand more effectively	
022 – Norwell and Norwell Woodhouse Parish Council	In relation to Stage 3, further clarification was sought on point 6.5 to determine what this meant and how it impacted on rural areas.	<p>Windfall sites are sites which come through the planning system that are not allocated in a Development Plan. The NPPF (2024) permits Councils to include an allowance for windfall development.</p> <p>It states at Paragraph 75 that ‘where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.’ Based on our local evidence since 2013/14, 53% of all housing completions comprise of windfall sites. A windfall allowance is not used in the supply of employment land.</p>

Question 7: Do you have any comments on Chapter 7 (Stage 4: Assessment Review) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
008 – Cllr John Lee	The indicative trajectory must not just reflect technical deliverability but must consider social fatigue and fairness. Areas like Fernwood and Lowfield Lane cannot keep being treated as deliverable by default just because infrastructure is already in place. That logic punishes the communities who've already done their part. The trajectory must fairly balance where housing should go, not just where it can go. Relying too heavily on previously developed areas without a reset will cause long-term public disengagement from planning.	The indicative trajectory will be prepared in accordance with National Planning Practice Guidance. The trajectory does not choose where housing should go but indicates where suitable land may be available for development. The Spatial Strategy that forms part of the Local Plan will determine where housing should be located.
013 – Resident	Keep area zones as they Are, don't change boundaries to suit/include site. If an area is rural, it stays rural.	Comments noted.
015 – Fytche-Taylor Planning c/o NTU	Enhancing the previous methodology, an indicative trajectory will outline the development potential of all sites and their anticipated delivery timeline. We agree that sites demonstrably deliverable in the shorter term should be given positive weight.	Comments noted and welcomed.
026 – Balderton Parish Council	We can see the 2023 assessment for Newark and Balderton and the answers that officers have asked at https://www.newark-sherwooddc.gov.uk/shelaa/ Should the questions be updated to include more such as: <ul style="list-style-type: none"> - STW data on flooding/sewage capacity - Is there capacity for an SSSI buffer? - Is there a shortfall of open spaces? If yes by how much? - Is there a shortfall of pitches? If so by how much? 	Comments noted. Some elements highlighted will be covered by the SHELAA process, others by decision making as part of the wider Local Plan process.

Question 8: Do you have any comments on Chapter 8 (Stage 5: Final Evidence Base) of the SHELAA Methodology?

Respondent ID / Organisation	Summary of Comment	Response / Action
008 – Cllr John Lee	The final evidence base must be more than a desk-based exercise—it needs to clearly demonstrate that public feedback and democratic input have shaped outcomes. Publishing maps and assessments is welcome, but if the same overused locations reappear, the evidence base loses credibility. Sites must be justified not just by planning logic but by fairness, deliverability in community terms, and balanced geographic spread. If it simply echoes developer interest, it fails its purpose.	The final evidence base will comprise of a desk-based study, discussions with statutory consultees, a review of any documents submitted to us and site visits. Site identification will be informed by the Spatial Strategy identified as part of the Local Plan process and is therefore outside the scope of the SHELAA Methodology.
009- Historic England	The last stage of the proposed methodology is set out as the Final Evidence Base. We have no concerns about that approach but would suggest that the Plan is clear about where impacts on the historic environment are set out - whether through the SHELAA information informing the Sustainability Appraisal, through a separate historic environment topic paper setting out how impacts on significance have been considered for any relevant preferred allocation sites, or through an alternative document. Clarity around the Council's assessment work would help demonstrate NPPF Paragraph 203 requirements for a positive approach to the historic environment in the plan making process.	Comments noted. The site assessment process will look at the historic environment in detail.
010 - Nottinghamshire Wildlife Trust	<p>There is no guidance on the level and detail which should be included in an ecological assessment. Please see our comments in section Chapter 5 (Stage 2: Sites / Broad Location Assessment) of the SHELAA Methodology. We appreciate that there needs to be a balance between getting enough information up front to ensure that the sites being promoted and which may potentially be allocated can be delivered against putting the prospective developer to too much expense too early in the process. The SHELAA asks questions about land ownership, consent to develop and timescales for development but we do not think the methodology requires an appropriate level of detail to identify potential ecological constraints which could affect deliverability.</p> <p>We would certainly expect that if sites were considered for potential allocation, then further details would be required to particularly ensure that protected species are fully considered in the allocation process. An ecological desktop study</p>	Comments noted. The SHELAA is a technical assessment and any sites that are potentially suitable for protected species will require an Ecological Impact Assessment prior to any planning decision.

	<p>may not provide sufficient information. See previous comments. We understand that the viability of allocated sites will now be part of the plan making process as required by the NPPF. This may require further amendments to data collected through the SHELAA to ensure sites with potential viability issues are highlighted at this stage to ensure further investigations are made to enable the site to be delivered if allocated.</p>	
011 - National Highways	<p>The SHELAA identifies a total of 6,903 “potentially suitable” dwellings and a further 1,112 dwellings may be suitable over the 15-year plan period. It also highlights 114.44 ha “potentially suitable” employment land and 42.12 ha of land that may be suitable within the same period.</p> <p>While the SHELAA is a key part of the evidence base, it does not in itself determine whether a site should be allocated for development in the Local Plan. It should be used alongside other supporting evidence when addressing anticipated future growth and Plan preparation.</p> <p>Although growth proposals in the new Local Plan are yet to be finalised, it is essential that they are supported by a robust transport evidence base. We would welcome early sight of this as soon as it becomes available.</p> <p>Any proposed site allocations that could impact the SRN must be accompanied by clear, site-specific evidence of the potential impacts on key junctions. This includes a comprehensive assessment of the cumulative impacts of all developments proposed in the Plan. These assessments must be developed in consultation with National Highways and be fully aligned with the DfT Circular 01/2022. Depending on the scale and nature of the identified impacts, appropriate and deliverable mitigation measures must be identified and secured where necessary.</p> <p>The transport demand generated by new developments should be accommodated either via the existing highway network or through sustainable, non-motorised transport solutions. Where required, new highway infrastructure should be identified to maintain the safe and efficient operation of the SRN.</p>	Comments noted.

013 – Resident	There is only 1 "retail" suitable site, yet we have a town full of empty properties. Think outside the box, resident would be less inclined to object if good use was made of existing opportunities.	This is a site in the current SHELAA and falls outside the scope of the Methodology document.
015 – Fytche-Taylor Planning c/o NTU	Building on the previous methodology, the SHELAA will be presented as a comprehensive written report, incorporating location maps and assessments grouped by settlement. We support this approach, as it aligns with the presentation of SHELAA reports in most other Local Planning Authority areas, ensuring consistency and clarity in site assessments.	Comments noted and welcomed.
016 – Southwell Civic Society	<ul style="list-style-type: none"> Para 8.1 – The type and quantity of development should include a statement of housing mix required. 	Comments noted. This is outside the scope of the Methodology Report.

Question 9: Do you have any other comments?

Respondent ID / Organisation	Summary of Comment	Response / Action
002 – Canal and River Trust	The Trust have reviewed the document and based on the information available we have no comment to make.	Comments noted and welcomed.
003 – Natural England	Natural England does not consider that your draft Methodology proposals pose any likely risk or opportunity in relation to our statutory purpose and so does not wish to comment on this consultation.	Comments noted.
004 - Witham IDB	Through the planning process the Board will continue to comment on the individual planning applications, as and when they are submitted. Please send consultations to planning@witham3idb.gov.uk Within the Upper Witham Internal Drainage Board district under the terms of the Land Drainage Act. 1991 the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse including infilling or a diversion.	Comments noted.
005 – Lincolnshire County Council	Thank you for the opportunity to engage at this early stage and we look forward to working together further in the future.	Comments noted.
006 – Resident	Individuals on the Self-Build register should have the opportunity to see potential build opportunities.	All sites which form part of the SHELAA will be available to view on the Council's website.
007 – Millgate Conservation Society	Natural Environment - As the town expands at its perimeter, the locality becomes more densely developed and we increasingly value the surviving wildlife within the natural environment. The assessment will need to embrace this aspect.	Comments noted.
008 – Cllr Johno Lee	The greatest difficulty in the planning process is the disconnect between what residents and councillors know is urgently needed—more medical facilities, schools, GP surgeries, and other vital infrastructure—and what the planning system is actually empowered to deliver. Local authorities are forced to allocate more housing without the power to guarantee the services those homes require. Residents experience this first-hand and rightly question the fairness and logic of the system. This disconnect undermines trust in planning decisions. If infrastructure delivery remains outside the planning remit, then public opposition will only grow. This must be acknowledged as a central flaw and addressed in future policy.	Comments noted but falls outside the scope of the SHELAA Methodology document.

<p>010 - Nottinghamshire Wildlife Trust</p>	<p>A significant proportion of sites put forward in the Strategic Housing and Employment Assessment Main Report (December 2023) for development are either adjacent to Local Wildlife Sites (21) or in the case of CRO0016 and NEW0002, 8 LWS will be directly impacted (see comments in section Chapter 4 (Stage 1: Site Identification) of the SHELAA Methodology). In circumstances where a LWS is not being developed directly, adverse impacts can occur from adjacent development. Without adequate consideration and protection there is potential for an adverse impact during the construction phase due dust deposition, pollution, changes to drainage and direct damage from construction activity and machinery. After the construction phase there is potential for disturbance if a LWS is accessible to people. Trampling of plants; nutrient input from dog faeces, predation of wildlife by cats, fly tipping of garden waste and disturbance of fauna could have a significant adverse impact. In addition, it is not appropriate to isolate/fragment LWSs or habitats for protected species because they cannot then function as part of a larger ecosystem and there are barriers to dispersal/migration of animals. Simply establishing a buffer around a LWS may not adequately protect it from the impacts described above and wouldn't necessarily improve ecological networks as advocated in the NPPF and The Lawton Review published in 2010, that states we need to make our network of sites bigger, better, and more joined up. If there are sites that would result in isolation of habitats then we consider that the development would be contrary to the approach in the National Planning Policy Framework (NPPF 2024).</p> <p>Section 187 of the NPPF states: <i>Planning policies and decisions should contribute to and enhance the natural and local environment by</i></p> <p><i>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and</i></p> <p><i>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and</i></p>	<p>Comments noted. We are preparing a new SHELAA and will be undertaking a 'call for sites' exercise later this year. All landowners with sites in the current SHELAA will be invited to resubmit their site using the new form and a new and full assessment will be undertaken in accordance with the new methodology.</p>
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	<p><i>future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.</i></p> <p>Section 188 states: <i>Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</i></p> <p>Section 192 states: <i>To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</i></p>	
011 - National Highways	<p>In relation to this consultation, National Highways' principal interest is in safeguarding the operation of A1 and A46 which fall within the District.</p> <p>In responding to the draft SHELLA Methodology consultation, we refer to the Department for Transport (DfT) revised Circular 01/2022 – Strategic Road Network and the delivery of sustainable development ('the Circular'), which sets out how interactions with the SRN should be considered in the making of Local Plans. Paragraph 28 of the Circular sets out that:</p> <p><i>The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being</i></p>	Comments noted.

	<p><i>relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.</i></p> <p>In addition to the DfT Circular 01/2022, the response set out below is also in accordance with the NPPF and other relevant policies, which helps to ensure the soundness of the Local Plan is being appropriately considered (from a transport perspective).</p> <p><u>Duty to Co-operate</u></p> <p>We recognise Newark and Sherwood District Council's commitment to working with relevant authorities and stakeholders to support sustainable development. For any development that may have cross boundary impacts, we encourage a coordinated and collaborative approach. This should include engagement with National Highways, neighbouring local authorities, and prospective developers. Such joint working will help ensure that shared interests are reflected, and effective solutions are delivered.</p> <p>We have no further comments at this stage and would welcome ongoing engagement with Newark and Sherwood District Council to support the delivery of planned growth.</p>	
12 – Coal Authority	<p>The records of the Coal Authority, trading as the Mining Remediation Authority, indicate the presence of coal mining features at surface and shallow depth in the area including; mine entries and reported surface hazards. These features pose a potential risk to surface stability and public safety.</p> <p>If coal mining features are recorded to be present on a site we would expect these to be identified as part of the site assessment as they may impact on the quantum of development that can be accommodated in any future allocation.</p>	Comments noted.

013 – Residents	Listen to constituents, is called democracy. You are here to serve constituents not central government.	Comments noted.
015 – Fytche-Taylor Planning c/o NTU	Further comments: We support a call for sites and will actively participate in the consultation and local plan review. NTU values its collaboration with NSDC and looks forward to exploring future options for Brackenhurst Campus.	Comments noted.
016 – Southwell Civic Society	<p>How this will be affected by the reorganisation of local government and when the new unitary authority is likely to be established?</p> <p>We understand NSDC have a commitment for their relevant experts to do site assessments of sites. In the case of biodiversity to assess the implications for Biodiversity Net Gain, valuable habitat and species and where appropriate issue TPOs prior to Allocation</p>	Comments noted. Any successor Local Planning Authority will be required to have an understanding of their land supply.
017 – Resident	Please can you stop anymore development on Lowfield Lane after present planned development? We have Fernwood, Middlebeck the old Worthington Simpson's site all ever expanding and impacting on infrastructure, which will struggle to cope. No extra services. I'm aware NSDC have targets from the Government but would think these sites alone will meet or surpass, without driving the last bit of nature from the last bit of natural on Lowfield Lane We are meant to be protecting nature too.	Comments noted. Site identification will be informed by the Spatial Strategy identified as part of the Local Plan process and is therefore outside the scope of the SHELAA Methodology.
018 – Balderton Wildlife Facebook Group	<p>This consultation is tendered in good faith on behalf of the 1400 members of the Balderton wildlife group on Facebook and myself. It is quite a complex process for laypeople to engage with and should be made more accessible and understandable. I have tried to include the relevant points in the section where i see they fit best but may not be to those more familiar with the process.</p> <p>2.Strong presumption should be given against development of sites that have great potential to provide ecosystem services such as natural flood management (NFM), flood storage, wildlife corridors to ensure biodiversity connectivity consistent with current govt policy. This also links well with the presumption against development in flood zone 2. These areas may also provide other multiple social benefits such as green space access, connectivity, green transport, mental health, or other similar initiatives such as green burial sites/ community hubs which should be recognised</p>	<p>Comments noted.</p> <p>Sites which are partly in Flood Zone 2 will not be immediately discounted and will be subject to a full site assessment before a final and evidenced decision can be made as to whether a site may be suitable for development.</p>

020 – South Muskham & Little Carlton Parish Council	<p>My Members did not have any comments on the methodology contained with the document, however, they did have concerns in relation to the site assessment forms and the contradictory information in terms of availability, suitability, etc. The minute is below:</p> <p>Members noted the information circulated in relation to the consultation. The Clerk was asked to seek clarification on the land outlined at SMU0019 as there were contradictory entries on the document and it was not clear where this land sat within the SHELAA.</p>	<p>Comments made refer to existing sites in the SHELAA and fall outside the scope of this consultation. For info, all sites currently in the SHELAA will need to be resubmitted using the new 'call for sites' form and if not, will not be carried forward.</p> <p>The extent of SMU0019 can be seen here on page 3 of the pdf.</p>
022 – Norwell and Norwell Woodhouse Parish Council	<p>Members considered that the site assessment forms were contradictory in relation to the suitability and achievability comments. An example was given in relation to NORW0212 which gave a suitability conclusion of 'Not Suitable', yet an achievability conclusion of 'Achievable' and that was repeated on other site assessment forms in relation to Norwell.</p> <p>The site assessment form in relation to NORW0235, listed as 'Achievable', did not take into consideration that it was adjacent to important Listed Buildings and Heritage Assets which could render it unachievable. Neither did it have direct access and was considered to be 'land locked'.</p> <p>The Chair also sought clarification on developments within the open countryside, as a number of the sites included within the site assessment form were outside of the village envelope and clearly within open countryside.</p>	<p>Comments noted. Existing site assessment forms and sites within the existing SHELAA fall outside the scope of this consultation. All sites submitted in the upcoming 'call for sites' exercise will be subject to a new site assessment form.</p> <p>In relation to a site being 'suitable', this refers to a site's potential for housing development while 'achievable' focuses on the realistic prospect of that development being able to occur. So, a site may not be suitable because it is in flood zone 3 but could be achievable because the landowner is actively promoting the site.</p> <p>Development in the open countryside will still be assessed by Spatial Policy 3 and Policy DM8 until a new Local Plan has been adopted.</p>
024 – Farndon Parish Council	<p>In terms of the Site Assessment Forms, Members noted FARN0237 (Now F23). The form refers to there being public transport available to get pupils to secondary schools, this is not the case as the timings do not allow that medium.</p>	<p>Comments noted. Existing sites within the SHELAA fall outside the scope of this consultation. For info, all sites currently in the SHELAA will need to be resubmitted using the new 'call for sites' form and if not, will not be carried forward.</p>

	Further Members noted the contradictions within the forms in relation to suitability, availability, and achievability. Additionally, the site is not 800m from a primary school, it is 0.8 miles, so there is an inconsistency in information.	Suitability, availability, and achievability are the tests required by National Planning Policy. Data on access to services is provided by Nottinghamshire County Council.
026 – Balderton Parish Council	Local water company feedback on capacity for sewage for 50+ dwellings should be compulsory.	Comments noted. Severn Trent are a statutory consultee and will be engaged throughout the Local Plan process. They are also consulted at planning application stage.



Newark & Sherwood Local Development Framework

Strategic Housing and Employment Land Availability Assessment

Draft Methodology

April 2025

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1 Introduction

Scope of the Methodology Report

- 1.1 Newark & Sherwood District Council are working towards the preparation of a new Local Plan. Once adopted, the Local Plan will guide future growth and development in the district and supersede the current Local Development Framework.
- 1.2 This report sets out Newark & Sherwood District Council's ('NSDC') methodology for undertaking the Strategic Housing and Employment Land Availability Assessment ('SHELAA'). This methodology is proposed to update and replace the previous Nottingham Outer Strategic Housing Land Availability Assessment Methodology which was originally produced in 2008.
- 1.3 The methodology has also been updated to reflect changes to national planning policy.

What is a Strategic Housing and Employment Land Availability Assessment?

- 1.4 The National Planning Policy Framework ('NPPF') requires strategic policy-making authorities to have a clear understanding of the land available in their area for housing and economic development uses through the preparation of a Strategic Housing and Economic Land Availability Assessment ('SHELAA').
- 1.5 The overall purpose of the availability assessment is to identify a future supply of land that is:
 - Suitable for housing or economic development uses;
 - Available for development now or at a point during the plan period; and
 - Achievable (i.e. likely to be a viable development during the plan period and at the point envisaged).
- 1.6 The process of undertaking the SHELAA is intended to act effectively as a baseline and ensure that all land is consistently assessed as part of the Local Plan preparation process. It will identify which sites are the most suitable and deliverable for a particular use and the Council will also end up with a list of sites considered as the 'reasonable alternatives' for development.
- 1.7 The SHELAA does not in itself determine whether a site should be allocated for development in the Local Plan nor does it guarantee planning permission would be granted or give any weight as part of a planning application. It is just one of the key evidence base documents utilised in addressing anticipated future growth and Plan preparation.
- 1.8 The SHELAA is a 'live' document and any information is correct at the time of publication. Any subsequent changes, such as the results of Local Nature Recovery Strategy, will be integrated as appropriate.

2 National Planning Policy Context

Introduction

- 2.1 This section provides an overview of the national planning policy context informing the approach to the SHELAA. This is as set out in the National Planning Policy Framework (2024) ('NPPF') and the National Planning Practice Guidance ('PPG').
- 2.2 The NPPF requires local authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In the Newark & Sherwood District, this also includes an assessment of employment land availability.
- 2.3 The SHELAA provides an audit of land that is suitable, available and achievable for housing and economic development/employment uses over the Local Plan period. From this, the NPPF requires Local Plans to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
- a) Specific, deliverable sites for five years following the intended date of adoption, and
 - b) Specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 2.4 The PPG sets out how land availability assessments should be undertaken and states that they should:
- Identify sites and broad locations with potential for development;
 - Assess their development potential; and
 - Assess their suitability for development and the likelihood of development coming forward (availability and achievability).
- 2.5 The PPG also confirms that the assessment does not itself determine whether a site should be allocated for development and that it is the role of the assessment to provide information on the range of sites which are available to meet the local requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.

3 Methodology

Introduction

- 3.1 The PPG states that an assessment of land availability identifies a future supply of land, which is suitable, available and achievable for housing and economic development uses over the Plan period.
- 3.2 The Council will follow the standard methodology for assessing housing and economic land availability, as set out in the PPG and shown on the flowchart at Appendix 1. The PPG states that an assessment should:
- Identify sites and broad locations;
 - Assess their development potential; and
 - Assess their suitability for development and the likelihood of development coming forward (availability and achievability).
- 3.3 The PPG requires Local Authorities to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land.
- 3.4 The PPG methodology includes the following stages:
- Stage 1: Identification of sites and broad locations;
 - Stage 2: Site / broad location assessment;
 - Stage 3: Windfall assessment (where justified);
 - Stage 4: Assessment review; and
 - Stage 5: Final Evidence base.
- 3.5 The focus of the SHELAA methodology is on Stages 1 and 2 of the PPG methodology. The assessment and findings relating to Stages 3, 4 and 5 will be presented in separate evidence base documents which include the Strategic Housing and Employment Land Availability Assessment Main Report (Stage 3 and 5) and a Windfall Assessment contained in the Five Year Housing Land Supply Report (Stage 4).

4 Stage 1: Site Identification

Geographical Area

- 4.1 The PPG states that the area selected for the SHELAA assessment should be the plan-making area; this could be the local planning authority area, two or more local authority areas, areas covered by a spatial development strategy, or areas covered by the Local Enterprise Partnership.
- 4.2 Previously, the SHELAA methodology was undertaken at 'Outer Nottingham Housing Market Area' level comprising Ashfield District Council, Mansfield District Council and Newark & Sherwood District Council. The area covered by the SHELAA is now based on the administrative boundary of Newark & Sherwood District Council instead of the wider Housing Market Area.

Site Identification

- 4.3 The sites identified in the SHELAA have come from a number of sources. Potential sources that may have been used to collate the SHELAA sites are listed in the table below.

Table 1: SHELAA Site Sources

Type of Site	Potential Data Source(s)
Existing housing and employment allocations	Adopted Development Plan
Planning permissions for housing and employment development that are unimplemented or under construction	Contained in separate NSDC Housing Land Supply Database and Employment Land Monitoring Reports
Planning applications that have been refused (including those subject to appeal) or withdrawn.	Desktop review
Undetermined planning applications, including those subject to pending legal agreements.	Desktop review
Pre-application enquiries that haven't progressed	Contact landowner / applicant
Land in local authority ownership	Engagement with NSDC and general day-to-day liaison
Surplus public land / land likely to become surplus	Engagement with public bodies via informal 'call for sites' exercise.
Rural Sites	Desktop review Existing SHELAA sites Local knowledge Local Plan Evidence Base 'Call for Sites' exercise
Redevelopment / redesign of established employment areas	
Sites in and adjoining settlements	
Potential urban extensions and new settlements	

Call for Sites

- 4.4 The District Council will carry out a 'Call for Sites' exercise in 2025 to provide landowners and developers an opportunity to submit their sites.
- 4.5 This exercise will seek the following type of information:
- Site ownership details
 - Legal issues/constraints

- Current and potential land use
- Any viability information
- Estimated timescales for delivery
- Environmental information
- Any known constraints
- Access to utilities, road network and any neighbour issues.

- 4.6 As historically, the 'call for sites' submission will be kept 'open'. Any sites submitted after the end of the formal 'call for sites' exercise will be assessed as part of the next update of the SHELAA.

Determining Which Sites and Areas Will Be Surveyed

- 4.7 The PPG requires plan-makers to assess a range of different site sizes, from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate and necessary.
- 4.8 The PPG is clear that sites should not be excluded from the assessment simply because of current policy designations. It states that *'there may be some sites which, when taking into account national policy and designations, it will not be appropriate to carry out these more detailed assessments for, where it is clear that they will not be suitable for development.'* These initial surveys should be proportionate.
- 4.9 Previously, sites submitted for residential development were filtered out if they had capacity for less than 5 dwellings or for employment development this was less than 0.25ha in size or less than 500 sqm in floorspace. This is proposed to remain the same.
- 4.10 A number of national and local designations and other factors have informed the Stage 1 assessment. These factors include Flood Zone 3, Sites of Special Scientific Interest (SSSI) and maintaining the minimum site threshold detailed above. Table 2 below sets out the criteria for excluding sites from the Stage 1 Assessment.

Table 2: Exclusion Criteria for Stage 1

Stage 1 Criteria	Reason
Sites with capacity of less than 5 dwellings for residential or 0.25ha for employment (or 500sqm of floorspace)	This is in accordance with PPG. Sites can still come forward through the planning application process.
Sites within Flood Zone 3	Land that is wholly in flood zone 3 will not be included in the SHELAA. Sites that lie partly within flood zone 3 will be carefully considered at Stage 2.
Designations including Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSI), Local Wildlife Sites , Local Nature Reserve, Ancient Woodlands, Scheduled Ancient Monuments.	These are important designations and any sites for development within these designations will be excluded. Any sites adjacent to these designations will be carefully considered at Stage 2.

- 4.11 Green Belt has been excluded from this list as it tightly constrains several key settlements (including Lowdham, Blidworth and Rainworth), and as a result may be prohibitive to achieving a sustainable growth strategy for the District. Therefore, sites will not automatically be screened out based on their location in the Green Belt. A standalone Green Belt Assessment will be undertaken which will assist the Council in determining whether there are specific

areas of land that could be considered for release from the Green Belt to aid meeting housing and / or employment need.

- 4.12 Any site that is wholly, or mostly affected by any of the criteria in Table 2 will be excluded from the assessment. Where only part of a site falls within any of the criteria above, a judgement will be made whether to include the site in the SHELAA and the developable area will be reduced.
- 4.13 If there are insufficient sites to meet the housing need, it may be necessary for sites excluded at Stage 1 to be assessed through Stage 2.

5 Stage 2: Sites / Broad Location Assessment

- 5.1 Stage 1 will result in a list of identified sites for further assessment for housing and economic development. Stage 2 involves an assessment of the development potential of these sites and will determine whether the SHELAA sites are considered to be 'available, suitable and achievable'. The Stage 2 assessment also takes account of the findings of the desktop review.

Assessment of Availability

- 5.2 The starting point of Stage 2 is to determine if the site is available for development. The majority of the sites have been identified through 'call for sites' submission by a landowner or developer.
- 5.3 For new sites put forward through the 'Call for Sites' exercise, whereby a completed submission form is submitted, the site will automatically be deemed available. If sites have been identified through other means, such as refused planning applications, efforts will be made to identify landowners and contact them to seek their views on the potential availability of the site for development and, where possible, obtain a completed Call for Sites submission. Where it is not possible to identify or contact owners, a reasoned judgement will be made as to the likelihood of development coming forward on individual sites and therefore whether the site should be deemed available or not.
- 5.4 Sites with extant planning permission will be assessed as 'available' unless there is evidence to suggest otherwise.
- 5.5 The Council will endeavour to confirm availability at regular intervals to ensure that the sites continue to remain available for development. Where the Council has been unable to contact the landowner / developer, or a landowner confirms that there is no longer an intention to develop the site, the site will be treated as 'not available'.
- 5.6 Landowners with sites previously contained in the SHELAA will be contacted in 2025 inviting them to complete the new SHELAA form which has been prepared as part of updating this methodology.
- 5.7 Based on the assessment of availability, sites will be split into one of the following categories:
- **Red** will generally indicate that a site is not available;
 - **Amber** will indicate that a site is potentially available / available in the future;
 - **Green** will indicate that the site is available now.

Assessment of Suitability

- 5.8 The PPG requires an assessment of the suitability of the site for the intended use or mix of uses. These may include, but are not limited to:
- market housing;
 - affordable housing
 - self-build;
 - housing for older people; and
 - economic development sites.
- 5.9 The assessment of the suitability of sites is guided by the Development Plan and national policy, and by market and industry requirements.

5.10 The Council has developed an assessment framework for the SHELAA that will align with, and input into, the Local Plan site assessment and Sustainability Appraisal assessments, that will be undertaken as part of the preparation of the forthcoming Local Plan. The table below sets out the assessment criteria that will be used to assess the suitability of sites for development. A traffic-light system will be used to assign colours to each assessment factor:

- **Red** will generally indicate that a site is not suitable (and no mitigation measures could make it suitable) with respect to that factor;
- **Amber** will indicate some constraints or negative impacts that can potentially be mitigated against / resolved;
- **Green** will indicate a high level of suitability on that factor.

5.11 Based on the assessment of all the factors, Officers will then make a judgement as to the site's overall suitability. The suitability factors includes:

- Location in relation to existing settlement;
- Land use classification;
- Compatibility with the surrounding uses;
- Access to services via public transport / walking;
- Proximity and access to green spaces;
- Policy considerations [\(for example Green Belt and Open Breaks\)](#);
- Physical constraints (including highways [and sewerage capacity](#));
- Impact [of](#) landscape and biodiversity and historic environment.

5.12 Sites with extant planning permission, or where planning permission has recently lapsed will be presumed to be suitable. Sites with constraints that need further investigation are categorised as 'may be suitable'. Sites where constraints are insurmountable are categorised as 'not suitable'.

5.13 In some instances, the suitability of a site may not be assessed due to the site not being available.

Assessment of Achievability

5.14 A site is considered achievable where there is a reasonable prospect that the type of development in question will be delivered on site within the timescale envisaged. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete the development over a certain period.

5.15 As it is impractical to undertake a detailed viability assessment of each of the SHELAA sites, the Council has drawn from the following in order to make an assessment of achievability:

- Information taken from 'call for sites' form [\(including details on any legal agreements\)](#);
- Informal discussions with landowners;
- Existence of any interested parties;
- Existing evidence base, including the assumptions in the Whole Plan Viability Assessment;
- Build rates for similar / nearby sites;
- Residential market strength in the area;
- Identified constraints e.g. ground conditions, abnormal costs, [covenants](#).

5.16 The findings from the achievability assessment will be categorised as set out below. As this is a high-level judgement, further detailed assessment of the site by the landowner may be able to demonstrate that the site is at least potentially available.

- **Red** will generally indicate the site is not achievable;
- **Amber** will indicate the site might be achievable or potentially be achievable in the future;
- **Green** will generally indicate the site is achievable now.

5.17 In some instances, the achievability may not be assessed as the site is not available.

Approach to Density

5.18 Another part of Stage 2 is to estimate the number of homes or the amount of employment floorspace and when this might be able to come forward. The PPG advises that the site capacity should be derived from existing Local Plan policies on density. The densities for housing in the table below are derived from the Amended Core Strategy (2019).

5.19 As a 'rule of thumb', the starting point (including where site capacity is not specified in site submissions) for determining site capacity is based on the following proportions and may be applied to the gross site area to give an indication of net developable area for different sizes of sites.

Table 3: Density Assumptions

Housing		
Site Size	Net Developable Area	Density
Newark Urban Area		
Up to 2ha	100%	40dph
2ha to 4ha	80%	
4ha+	65%	
Elsewhere		
Up to 2ha	100%	30dph
2ha to 4ha	80%	
4ha+	65%	
Employment		
Type	Ratio	Comment
Serviced plot on industrial estate fronting road	100%	
Area of land that could easily subdivide into serviced plots with road frontage	100%	
Large area of land on industrial estate too big for single scheme, having regard to other buildings on estate.	95%	Provision for spur road
Major undeveloped part of industrial estate or extension to industrial estate	90%	Provision for roads and landscaping to one or more sides
Small local allocation, requiring infrastructure	90%	Provision for spur road, but landscaping likely to be minimal
Level site allocated for industrial estate	85%	Provision for spur road and landscaping
Site allocated for industrial estate where terracing or bunding is required	75%	Provision for spur road and landscaping
Land allocated for business park with high landscape quality.	75%	Provision for spur road, extensive landscaping, balancing ponds etc
Land allocated for employment use where a single end user could be in the market.	100%	All land to be taken by single user, surplus areas to be kept for its expansion

5.20 However, whilst the table above is a good starting point, the proportion of developable area in respect of potential sites is likely to vary on a site-by-site basis, depending upon specific site

characteristics. For large sites, a bigger reduction in developable area may reflect access roads, on site open space, sustainable drainage systems and other ecological mitigation that would be expected to be provided as part of the development.

- 5.21 For these reasons, and to cautiously take account of site-specific constraints, when considering housing or employment potential of sites (no. of dwellings / amount of floorspace), the Council will have regard to:
- The yield set out in any planning permission or Local Plan allocation;
 - The yield indicated in the 'Call for Sites' submission;
 - Site constraints, including part of the site that may not be developable due to flood risk, nature conservation value, Biodiversity Gain Hierarchy in accordance with its statutory duty to conserve and enhance biodiversity, or are, needed, impacts on the significance of heritage assets (including setting) etc or that are needed for infrastructure / open space etc;
 - Density assessments based on Local Plan policy, and on local circumstances.

Estimated Built-Out Rates and Lead-In Times

- 5.22 The assumptions on build-out rates and lead-in times are set out in the tables below. These are based on past delivery of housing sites in the District since 2013. Unless there is evidence to indicate otherwise, these assumptions will be used to inform the SHELAA trajectory.
- 5.23 The assumptions relating to build-out rates (based on past delivery in the District) are set out in Table 4 below. The local evidence will be updated annually as part of the Statement of Five Year Five-Year Housing Land Supply Report.

Table 4: Assumptions on Build-Out Rates

Site Size	Average Annual Build-Out Rate	Sample Size
SUE's (3,000+ dwellings)	95dpa	2
500-999 Dwellings	46dpa	1
100-499 dwellings	42dpa	8
0-99 dwellings	41dpa	15

- 5.24 The assumptions relating to lead-in times (to first completion) from the granting of planning permission are set out in Table 5 below. The local evidence will be updated annually as part of the Statement of Five Year Five-Year Housing Land Supply Report

Table 5: Assumptions on Lead-In Times

Site Size	Lead-In Time	Sample Size
100+ dwellings	2.34 years	11
0-99 dwellings	2.26 years	19

6 Stage 3: Windfall Assessment

- 6.1 The PPG states that incorporating a windfall allowance for housing development in the SHELAA may be justified where a local planning authority has compelling evidence as set out in Paragraph 75 of the NPPF. Such evidence includes proof that such sites have consistently become available in the District and will continue to provide a reliable source of supply.
- 6.2 The NPPF at Paragraph 75 states that:
- “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”*
- 6.3 The past delivery rates on windfall sites demonstrate that these have been a reliable source of housing over recent years. A windfall allowance will be factored into the SHELAA in recognition of the significant contribution of windfall sites to housing supply.
- 6.4 The most recent windfall assessment is included in the [2024 Five Year Housing Land Supply Report](#) with a base date of 1st April 2023 – 31st March 2024.
- 6.5 A windfall allowance will not be included in relation to employment land supply as there is insufficient local evidence to support such an approach.

7 Stage 4: Assessment Review

- 7.1. In Stage 4 of the Assessment, an indicative trajectory will be produced to show the development potential of all the sites and when they are capable of being delivered.
- 7.2. 'Deliverable' sites will therefore be those considered capable of delivery in the first five years following the intended date of adoption of the Local Plan and 'developable' sites will be those considered capable of delivery for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 7.3. Once the indicative trajectory has been produced, the Council will review where there are sufficient sites / locations capable of meeting the housing and employment land need.

8 Stage 5: Final Evidence Base

8.1 In line with the PPG, the SHELAA will have the following outputs:

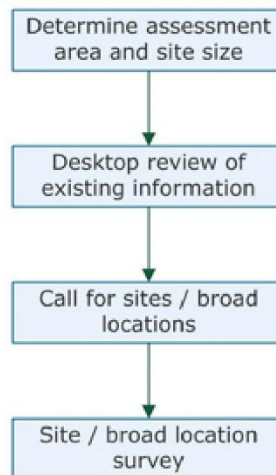
- A list of all sites or broad locations considered and their locations identified on maps;
- An assessment of each site or broad location, in terms of its suitability for development, availability and achievability to determine whether a site is realistically expected to be developed and when;
- An assessment of the potential type and quantity of development that could be delivered on each site / broad location, including a reasonable estimate of build out rates;
- Identifying any barriers to deliver and how this could be overcome;
- An indicative trajectory of anticipated development and consideration of associated risks;
- A list of discounted sites with clearly evidenced and justified reasons.

8.2 The SHELAA will be published as a written report with accompanying maps and assessments grouped by settlement. It will be published on the Council's website. The report will be split into two main chapters; housing and employment.

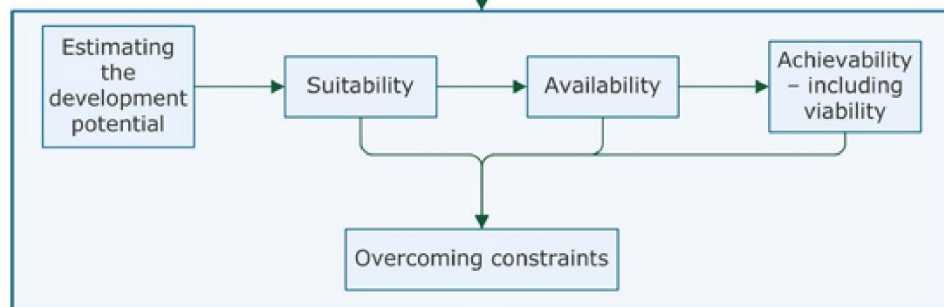
8.3 For each settlement, the SHELAA report will provide a summary of the potential supply from deliverable and developable sites.

Appendix 1: PPG Methodology Flowchart

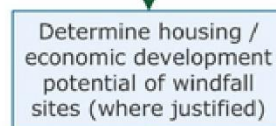
Stage 1- Site / broad location identification



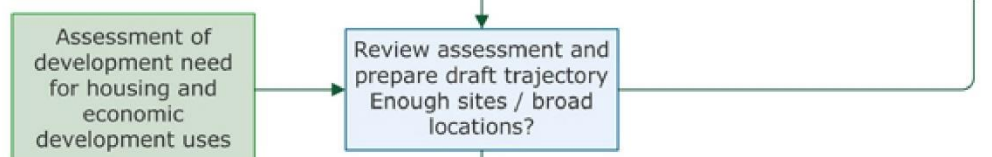
Stage 2 - Site / broad location assessment



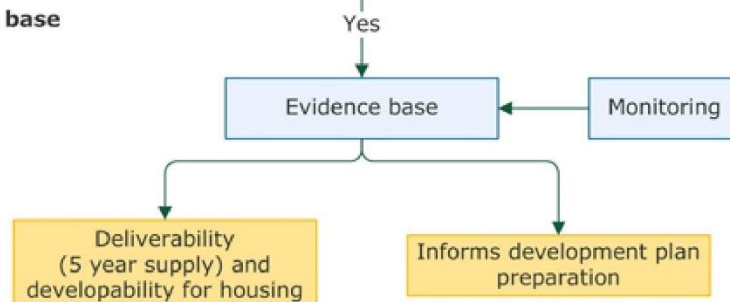
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



1

¹ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#Identification-of-sites-and-broad-locations>



Report to: Cabinet Meeting: 10 June 2025

Portfolio Holders: Councillor Simon Forde – Climate & the Environment
Councillor Paul Peacock – Strategy, Performance & Finance

Director Lead: Matt Finch – Communities & Environment

Lead Officer: Ryan Oliff – Waste & Recycling Manager, Ext. 5682

Report Summary	
Type of Report	Open Report / Key Decision
Report Title	Procurement of Vehicles for the Rollout of Domestic Kerbside Food Collection Service
Purpose of Report	The report outlines the vehicle requirements to prepare for the domestic food waste collections which start in October 2027. These collections will be a statutory service.
Recommendations	<p>That Cabinet approve:</p> <ul style="list-style-type: none"> a) a Capital budget of £1,304,750 financed by the £1,093,049 Capital Grant received in 2024/25 and the remaining £211,701 Revenue Contribution to Capital from the Revenue Grant received for the purchase of 8 food waste collection vehicles and 55,071 bins; b) the allocation of the remaining Revenue Grant of £1,215,299 (of the £1,427,000) to the Residential Food Waste Reserve in the event of additional costs; and c) the Revenue Budget increase from 2027/28 where possible, funded from Food Waste Reserve, in anticipation of an increase in the establishment by 18 new employees from 2027/28.
Alternative Options Considered	<p>Consideration was given to collect food waste using alternative collection methodology. Collection modelling was carried out to assess the viability of collecting using an entirely new fleet of split bodied vehicles or collecting alongside source separated recycling materials from the kerbside each week in a new fleet of recycling vehicles.</p> <p>These options were both discounted due to the significant capital expenditure required (estimated to be around £3m and £4m respectively) and the issue of needing to re-establish the 7-year fleet replacement schedule as an entire new fleet that is</p>

	the same age would otherwise need replacing at the same time.
Reason for Recommendations	The proposal aligns to Objective 5 of the Community Plan as we develop plans for a weekly food waste collection. There is a statutory requirement to provide a kerbside food waste collection service from October 2027.

1.0 Background

- 1.1 In 2018, the former Government laid its plans to revolutionise the way local authorities collected and managed recyclable waste through the National Resources & Waste Strategy. This has since been reviewed and is now being progressed under the title of 'Simpler Recycling'. One of the key parts of this strategy is the move to create consistent waste and recycling collections across the UK and to mandate local authorities to collect food waste on a weekly schedule from April 2026. All Waste Collection Authorities in Nottinghamshire have had a transitional arrangement agreed for food waste which means it will start 18 months later.
- 1.2 For Newark & Sherwood, this will mean as well as the current materials of plastic bottles, food and drink cans, aerosols and paper and card, items such as foil, food and beverage cartons and plastic tubs, pots and trays will also be acceptable in the silver bin mixed with the existing range of materials. It will also mean that we will have to provide all domestic properties access to a new weekly kerbside food waste collection.
- 1.3 For several reasons, there have been delays to implementing this policy but with recent payments being made by central Government to local authorities, we are now able to plan and budget for how these changes will impact NSDC.
- 1.4 The most notable changes and timescales for how we will collect waste and recycling going forward are:

April 2025

- Trade waste customers with 10 or more employees will be obliged to separate food waste and arrange for this to be collected separately.
- These businesses will also be required to separate and arrange collections for an extended range of recyclable materials.
- Schools and educational establishments are also required to separate and arrange collections for an extended range of recyclable materials.

April 2026

- All households will be able to add an extended range of materials in their silver bin such as food and beverage cartons, plastic tubs pots and trays and clean foil. These can be mixed with the items we can already accept.

April 2027

- All other commercial premises (with nine or less employees) will be required to recycle the full range of materials and separate any food waste for collection.
- All domestic and commercial premises will be able to recycle plastic film (soft plastics) from the kerbside such as bread bags, crisp packets and bubble wrap. There are still discussions taking place to determine the best way of implementing this.

October 2027

- All households and schools will be able to access weekly food waste collections from the kerbside.

2.0 Proposal/Details of Options Considered

- 2.1 Food waste collections will be taking place from October 2027 and plans have been drafted to determine round sizes, vehicle numbers, disposal points, bin colours, staff requirements and depot requirements. Discussions with Nottinghamshire County Council and Veolia are still taking place to determine the viability of varying the environmental permit to allow food waste to be taken to Veolia's transfer station on Brunel Drive but this is currently looking unlikely.
- 2.2 The current disposal option put forward, but Nottinghamshire County Council is an Anaerobic Digestion (AD) facility operated by 'Bio Dynamic' in Colwick. This is a 44-mile round trip from our depot so the travel time to tip there will account for a significant proportion of the working day.
- 2.3 To maximise efficiency and have as much operating time as possible, we intend to only make this journey once per day. Therefore an 11-tonne vehicle will be required to ensure that all of the food waste collected from a round each day can be confined to one load.
- 2.4 Previous collection modelling carried out by Wrap (Waste & Recycling Action Programme) in 2022 suggested that we may need 9 food waste vehicles to be able to cover the district each week plus 1 spare.
- 2.5 A waste composition analysis was carried out in 2024 and data suggests that, on average, each property would typically produce around 4kg of food waste per week. However, we know that participation in food waste schemes are never 100% and districts that are comparable to Newark & Sherwood District Council would typically expect to collect from around 45% of properties with those residents not wishing to take up the new service having the option to opt out prior to the delivery of caddies. However, this will not impact on the requirements of the vehicles. We are currently assessing options of supplying compostable food caddy liners for residents. Studies suggest that supplying these will result in an increase in participation rates (and therefore tonnage collected) but by liners, there will be an ongoing revenue burden of over £100,000 to consider.
- 2.6 In light of the data that we have available and to ensure that we getting best value for money, the proposal is that we purchase 7 food waste vehicles and 1 spare. Based on current property numbers and anticipated participation levels in the scheme, this would be enough to complete each round in one load. There should be enough capacity (weight) to be able to deal with a higher than anticipated capture rates or participation rates.
- 2.7 We also have over 60 schools in the district that will be expected to comply with the new government initiative and as this is classified as household waste, these will also need to be serviced by the 7 vehicles.

- 2.8 It is important to note that whilst the modelling and data that we have available is very useful, there is still a degree of uncertainty around the figures and they are based on some assumptions so if, after the scheme launched, it becomes apparent that the food waste collections are working at or close the limit of what we can reasonably expect them to work, it is proposed to have a budget available to place an order for an additional 1 or 2 vehicles.

Leased Land

- 2.9 A report was taken to Cabinet on 10 December 2024 to approve the first phase of the redevelopment of Brunel Drive and Farrar close, to ensure there is space for the additional vehicles which is currently expected to be complete by November 2025. A small parcel of land at Farrar Close is leased and in the agreement, it states any new plans for the site should be discussed with the landlord. Having concluded the discussion with the landowner, it has become apparent that since 2003, the rental has not been increased in line with the agreed rent reviews. Therefore, the annual rent payable has been increased from £11,500 to £31,520. This has also been backdated to 2017, for which provision has been made in the 2024/25 accounts.

Funding

Capital Funding

- 2.10 In January 2024, Newark & Sherwood were awarded £983k from central government to facilitate the introduction of food waste collections. This funding is intended to fully fund the purchase of the required quantity of collections vehicles and collection caddies for every household in the district. However, the value of the award was less than our own initial forecasted capital requirements of £1.6m and it has therefore been challenged. Some additional information was required (and has been supplied) and we were notified in March that an additional £109k was to be awarded.

Revenue Funding

- 2.11 In November 2024, Newark & Sherwood were awarded £1.427m from central government as part of their new Extended Producer Responsibility initiative which covers April 2025 to March 2026. Going forward, the award will be made quarterly and is a proportion of the funds raised by packaging producers to cover the cost of collecting and processing this waste and is calculated based on the volume of packaging collected as well as local property data including the rurality and deprivation of the district.
- 2.12 It is worth considering that the aim of this initiative is to incentivise producers to put less packaging on the market and look at alternative, more sustainable alternatives. If the extended producer responsibility is successful and the amount of waste reduces, it would be reasonable to assume a gradual year on year reduction in payments to local authorities. The last 4 years of data has shown a small but consistent reduction in recyclable material being collected each year despite housing growth.

Risks

Vehicles

- 2.13 The financial uncertainty that remains creates several risks, but the timescales involved in ordering the vehicles would be considered the most significant. As the move to weekly food waste collections will affect around 50% of local authorities across the country, the demand for the vehicles has been unprecedented and it is recommended that we order the vehicles sooner rather than later.
- 2.14 This proposal would secure today's prices and enable us to store the vehicles for a period of time and then register them when required in order to preserve the warranty period.
- 2.15 Modelling work that had been carried out only 3 years ago had costed the vehicles at around £80,000 however over recent months the cost has risen exponentially and the cost of suitable vehicles is now expected to be in the region of £125,000 - £130,000.
- 2.16 The expansion of the fleet will require an amendment to the operator's licence for Brunel Drive. The fleet size will be significantly higher than when the licence was initially awarded 20 years ago and it is possible that VOSA may wish to visit the site to establish our capabilities to accommodate the additional vehicles.

Local Government Reorganisation (LGR)

- 2.17 The plans to reform the way that local authorities operate will inevitably affect waste operations.
- 2.18 There is a working group including members of all local authorities in Nottinghamshire which has been looking at the various elements of implementing the food waste service.
- 2.19 The launch date of October 2027 was agreed with DEFRA as a transitional arrangement in advance of the LGR announcement and as we are stilling awaiting confirmation of what the new local government landscape will look like, it is not practical to wait for the this before securing the vehicles that we need to meet our statutory obligations. It should also be considered that inflation and competition for vehicles as reasons to press ahead to ensure that we obtain best value for money.
- 2.20 There is potential for partnership working for other elements of the food waste delivery project such as the joint procurement of caddies or communication campaigns as the lead times for these will fall closer to the 'go live' date and there should be some clarity with what the newly formed local authorities will look like by then.

Other Options Considered

- 2.21 The collection modelling carried out by Wrap in 2001 appraised different options of collecting refuse, recycling and food waste.

These included;

- Replacing the entire fleet of recycling vehicles and start a new weekly source separated collections service (plastics, cans, glass etc presented and sorted manually at the kerbside). This would include a section for food waste (image 1).

- Replacing the entire fleet of refuse and recycling vehicles and using brand new split bodied vehicles to co-collect food waste (image 2).



Image 1



Image 2

- 2.22 Either of these options would be prohibitively expensive and it would create an issue to re-establish the staggered fleet replacement programme that we have in place now.
- 2.23 The source separated option also does not complement the existing recycling disposal infrastructure.

3.0 **Implications**

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate.

Financial Implications FIN25-26/2001

3.1 **Trade/Commercial Food Waste Collections:**

- 3.1.1 In 2024/25 1 new 11 tonne Food Vehicle was purchased for £124,198 financed by the Capital Reserve, ready for use in April 2025.
- 3.1.2 The 2025/26 Revenue budget has been revised to reflect the increase to the establishment of 1x NS7 Driver at the cost of £40k including oncosts.
- 3.1.3 The running costs for a new Vehicle should be minimal in its infancy months and will be absorbed by existing budgets and built into future budgets. It is estimated that the new bin costs will be in the region of £12k (£20 x 600 240l bins) and will initially be absorbed by the Business Unit.

3.2 **Residential Food Waste Collections:**

Capital

- 3.2.1 The capital costs are detailed below.

		2026.27
NSDC		YEAR 0
CAPITAL	DETAIL	£
Vehicles		
	8 (inc 1 spare) x Food Waste Vehicles @ up to £130k per vehicle	1,040,000
Containers		
	x 55,000 COMBINED 23L @ £3.30 + 7L Bins @ £1.15	244,750
Communication		
	Communication Wrap x 8 Vehicles	20,000
TOTAL CAPITAL COSTS		1,304,750

- 3.2.2 The total Capital cost for 2026/27 is projected to be £1,304,750, down from £1,392,500 reported in May 2023. This decrease is due to the reduction in the number of vehicles from 10 to 8, although the cost per vehicle has risen from £90,000 to up to £130,000.
- 3.2.3 The cost of the 23L and 7L bins is now expected to be £244,750, a decrease from the £467,500 reported in May 2023.
- 3.2.4 Additionally, the cost of communication wraps on vehicles has been revised down from £25,000 (10 vehicles at £2,500 each) to £20,000 (8 vehicles at £2,500 each).
- 3.2.5 The Council received £1,093,049 from the Department for Environment Food and Rural Affairs (DEFRA) in 2024/25 to facilitate the introduction of food waste collections. This means, the Council needs to finance the remaining cost of £211,701.
- 3.2.6 The Council also received notification that £1,427,000 would be receivable from Government as part of their new 'Extended Producer Responsibility' (EPR) initiative. This is a revenue grant, and it is proposed that £211,701 is used to finance the Capital funding gap above as a revenue contribution to Capital (RCCO). The remaining £1,215,299 be proposed to be transferred to the Councils' reserve to assist with future funding of the operations, for either Revenue and/or Capital from October 2027 and building a provision for the cost of replacing the vehicles at the end of their useful life.

Revenue

- 3.2.7 The table below illustrates estimated annual revenue cost for running the food waste service and shows the change since the last Cabinet report in May 2023. For the purposes of this report, Year 1 shows a full 12months cost; however, as the operations commence Oct 2027, only 6 months will be budgeted for in the first year of operation.

	NSDC	May-23	Jun-25
REVENUE	DETAIL	£	£
One Off:			
Containers			
	Food Waste Liners - 1 FREE roll per Household (half year only)	143,000	-
Communication			
	Communication	59,750	99,000
On going:			
Vehicles			
	MRP & Interest for ALL Capital associated	265,351	-
	Vehicle Running Costs	203,500	181,250
Staffing			
	Drivers & Loaders	716,747	704,900
	Fitter/Mechanic	42,010	54,340
Containers			
	Replacements Bins	21,709	12,240
Contingency			
	System updates for rounds, R&R for Vehicles, Clothing & uniforms PPE and other unforeseen	-	25,000
TOTAL REVENUE COSTS		1,452,067	1,076,730

- 3.2.8 Annual revenue costs have decreased to an estimated £1,076,730 from the £1,452,067 that was reported in May 2023 with the cost of MRP being removed as there is now no need to borrow to purchase the vehicles, saving £265,351 per year.
- 3.2.9 The Bin Liners have been removed saving £143,000 (was just a one-off cost in year 1). Communication one off cost in year 1 has increased to £99,000 from the £59,750 reported in May 2023. Revised leaflet cost x household numbers assumed at 55,000.
- 3.2.10 Vehicle Running Costs have been revised based on a similar vehicle size to £25k per vehicle from £22k per vehicle, and 2 less vehicles; x 7.25 vehicles. £181,250 from the £203,500 that was reported May 2023.
- 3.2.11 Staffing costs have decreased. It was assumed that we would use a 7.5 tonne vehicle where LGV Licence was not required and therefore not needing to hire drivers on NS7, however this has now changed, and the size of the vehicle would be 11 tonnes. We have revised the 24 operatives to 9 Drivers and 9 Operatives (18 in total). Costs are now £704,900 from the £716,747 that was reported in May 2023. In addition to the operatives there is a mechanic that we have revised the salary figures on using 2027/28 plus the £5k Market Supplement currently in place from other mechanics. Now £54,340 from the £42,010 reported May 2023.
- 3.2.12 Replacement Bins has been revised down to £12,240 from £21,709 using the revised figures for the 23l + 7l bins.
- 3.2.13 A contingency budget to cover R&R, Software round updates, PPE, and any other unforeseen costs has been included, following lessons learnt from the Glass Recycling scheme of £25,000 per annum.
- 3.2.14 Inflation has been revised to 2% from 5% each year. Salaries remain with 3% inflation. It is debateable whether the inflation should just be 2% on vehicles, given transport inflation falls outside of the scope of general inflation, but this can be refined during budget setting.

- 3.2.15 2027/28 financial year has been calculated using a full 12 months; this may be revised down depending on start dates of new employees. The table below illustrates the Revenue impact on the MTFP for the future residential food waste collections (albeit year one shows a full year cost, this will be revised closer to the time when more accurate costings will be available):

		2027.28	2028.29	2029.30	2030.31	2031.32
NSDC		YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5
REVENUE	DETAIL	£	£	£	£	£
One Off:						
Communication						
	Communication (assumption - leaflets)	99,000	-	-	-	-
On going:						
Vehicles						
	Running Costs per Annum on 7.25 Vehicles @£25k per vehicle	181,250	184,880	188,580	192,350	196,200
Staffing						
	Drivers x 9 & Loaders x 9 for 9 Vehicles 18 in total @NS5/NS7	704,900	726,050	747,830	770,260	793,370
	Fitter/Mechanic x1 @NS9 £42,010	54,340	55,970	57,650	59,380	61,160
Containers						
	Replacements x 2,750 (5%) COMBINED 231 @£3.30 + 71 Bins @ £1.15	12,240	12,480	12,730	12,980	13,240
Contingency						
	System updates for rounds, R&R for Vehicles, Clothing & uniforms PPE and other unforeseen costs. This can be revised when in practice.	25,000.00	25,000.00	25,000.00	25,000.00	25,000.00
TOTAL REVENUE COSTS		1,076,730	1,004,380	1,031,790	1,059,970	1,088,970

FUNDING

	Capital	Revenue
Grant received by 31 March 2025		
DEFRA	1,093,049	260,040
Grant Due:		
DEFRA		97,323
Extended Producer Responsibility*		1,215,299
Extended Producer Responsibility	211,701	
Total Grant	1,304,750	1,572,662

*£1,427,000 total grant expected, less £211,701 committed to Capital as per paragraph 3.1.8

- 3.2.16 From 2027/28 the EPR grant is expected to meet the cost of the operations; EPR is expected to be an annual grant however, it is not currently known how much grant will be allocated each year. Of the total £2,877,412 funding received, £1,304,750 will be used for Capital and the remaining £1,572,662 will be in a reserve and drip fed into revenue as required should the EPR grant not cover the total cost of running the service.
- 3.2.17 In 2024/25 The Council received £260,040 New Burdens funding from DEFRA for the delivery of containers and project management and has been made aware that a further £97,323 is due to be received in 2025/26 for the Procurement and Communications of the new operations. These funds are and will be transferred to the Residential Food Waste Reserve until they are required.

3.2.18 The rental at paragraph 2.9 will result in a large payment for backdated rent, expected to be £94,500. Provision has been made to cover that payment in 2024/25's accounts and the budget will be increased accordingly during the 2026/27 budget setting process.

3.3 Legal Implications - LEG2526/582

The introduction of a weekly food waste service to all households is a statutory requirement. From 31 March 2026, waste collection authorities must provide weekly food waste collections from all households unless a longer transitional arrangement is agreed; this is the case for Nottinghamshire as set out in the report. Cabinet is the appropriate body to consider the content of this Key Decision.

3.4 Human Resources Implications - HR2526/1834 SL

There is a proposed increase of 18FTE from 2027/28 to deliver the new service. This is some way off into the future and therefore our data analysis on growth of the organisation as it currently stands won't be the same at the time, however, at the end of 2024/25 the establishment was 577.9 FTE.

The increase in 18 FTE represents growth of around 3%. As this is a new statutory service there will be a requirement to increase staffing to deliver it.

Closer to the time it will be necessary to review the management of the service and whether management responsibilities can be absorbed by the existing structure and whether the Job Evaluation of those management posts requires a review.

Recruitment of new staff will be carried out in line with the procedures in place at the time giving due consideration to issues of Equality, Equity, Diversity and Inclusion.

The current O licence holder will need to reapply for their licence; however, this does not impact on their employment.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

None



Report to: Cabinet Meeting: 10 June 2025

Portfolio Holder: Councillor Simon Forde - Climate & the Environment

Director Lead: Matt Finch, Communities & Environment

Lead Officer(s): Matthew Norton, Business Manager – Planning Policy & Infrastructure, Ext. 5852 / Nick Law, Biodiversity & Ecology Lead Officer, Ext. 5333

Report Summary	
Type of Report	Open Report / Key Decision
Report Title	Nottinghamshire & Nottingham Draft Local Nature Recovery Strategy Consultation
Purpose of Report	To inform Members of the production and consultation on the Local Nature Recovery Strategy by Nottinghamshire Council and to agree the District Council's response.
Recommendations	That: a) the proposed consultation response at Appendix B be approved; and b) the Portfolio Holder for Climate and the Environment, in consultation with the Planning Policy Board, be given delegated authority to comment at the next stage as set out in paragraph 2.7 of the report.
Alternative Options Considered	None, as a supporting authority it is considered important to respond to the consultation to assist the County Council in preparing the Local Nature Recovery Strategy.
Reason for Recommendations	To allow the District Council as a supporting authority to respond to consultations on the Local Nature Recovery Strategy.

1.0 Background

- 1.1 The Environment Act 2021 established a requirement to produce Local Nature Recovery Strategies for “areas” within England and that these strategies should cover the whole of England. The core purpose of a Local Nature Recovery Strategy (LNRS), as defined by DEFRA, is to help reverse the ongoing decline of nature and biodiversity in England through coordinated, practical and focused action.

- 1.2 Nottinghamshire County Council was formally appointed as the Responsible Authority for preparing, publishing, reviewing and re-publishing the LNRS for Nottinghamshire and Nottingham by the Secretary of State for Environment, Food and Rural Affairs on 26th June 2023. Newark & Sherwood District Council, along with the other local authorities in Nottinghamshire, the East Midlands Combined County Authority and Natural England are identified as supporting authorities in the legislation.
- 1.3 The LNRS must be evidence based, locally led and collaborative. It must include a statement of biodiversity priorities and a local habitat map. The statement covers:
- the existing biodiversity
 - opportunities and priorities, in terms of habitats and species, for recovering or enhancing biodiversity; and
 - proposals for potential measures relating to the agreed priorities.
- 1.4 The LNRS must be published and be publicly available, with the evidence base against which it has been formulated, in accordance with the format prescribed by Government. It must then be reviewed and republished as part of an ongoing cycle of appraising what the strategy has achieved and identifying what further work is needed for nature to recovery.
- 1.5 The County Council has worked with the SAs and a wide range of stakeholders to produce a draft LNRS for Nottinghamshire and Nottingham, in accordance with the Regulations and Guidance. This has included both in-person and online events and workshops to inform development of the Priorities and Measures and the subsequent Mapping of Measures. Stakeholders engaged through events and workshops have included planners, ecologists, environmental and land-based NGOs, organisations that operate at landscape scale, green space and partnership groups, parish councils, farmers and landowners, Environment Agency, Forestry Commission, University of Nottingham and Nottingham Trent University. This stakeholder input has informed the production of the consultation draft of the LNRS and the accompanying digital mapping of Measures.
- 1.6 The process for adoption of the LNRS is set out in the Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023 which came into effect on 13 April 2023. Under the Regulations, the County Council must provide a consultation draft LNRS to the District Council and other SAs, prior to undertaking a wider public consultation. Supporting Authorities have 28 days to raise an objection, which would be referred to the Secretary of State.
- 1.7 The County Council carried out this consultation in March and April 2025. The District Council in reviewing the document raised a number of issues with the County Council, but ultimately though officers decided that the matters raised could be addressed as part of any updates to the LNRS and therefore did not object. The Council's letter and a summary of these issues can be found at **Appendix A**.
- 1.8 No objections were received from SAs, and the County Council is now undertaking a public consultation on the draft LNRS for a period of 6 weeks. The consultation runs from 6 May to 16 June 2025. The Statement of Biodiversity Principals and the Local Habitat Map area available to view on the County's LNRS website: [Notts Nature Recovery](#)

- 1.9 Following the close of consultation, the County Council will consider the consultation response and finalise the LNRS. This is followed by a further 28-day period for the SAs to comment on the final version (and as at the pre-consultation stage can object to its publication) before notification can be given to the Secretary of State and the final version of the LNRS can be published.

2.0 Local Nature Recovery Strategy Proposals and District Council Response.

- 2.1 The County Council has engaged the District Council at various points during the production of the LNRS. Officers gave the County Council a detailed review of an earlier version of the mapped measures which had been provided. A number of issues were raised and as can be seen from the letter in **Appendix A** the County Council has attempted to address some of the concerns the Council has raised. Our continued concerns relate the suitability of some of the measures that have been set out for grassland and wet woodland and the usability of certain other mapped measures.

- 2.2 Ensuring the LNRS is appropriate is important not only in its own right but because of the influence it has on the planning process and wider land management policies. Under Section 40 of the NERC Act 2006, as a local authority, the District Council has a duty to have regard, in the exercise of our functions, to conserve and enhance biodiversity. This duty was further extended by amendments arising from the Environment Act 2021. This duty means that NSDC must have regard to the LNRS as this will define local priorities via locations for the protection, enhancement and creation of important biodiversity features.

- 2.3 The Government has provided guidance¹ as to how that ‘regard’ should be translated in terms of the plan making process:

“Local planning authorities should be aware of those areas mapped and identified in the relevant Local Nature Recovery Strategy and the measures proposed in them and consider how these should be reflected in their local plan. In doing so, they should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance. This will enable local planning authorities to support the best opportunities to create or improve habitat to conserve and enhance biodiversity, including where this may enable development in other location.”

- 2.4 Consequently, the LNRS will become an important component of the plan making process and will influence decision made on the location of new development and the policies and proposals in the new Local Plan. It should also be noted that once the LNRS is published it will replace the District Council’s interim [Mandatory Biodiversity Net Gain Strategic Significance Policy](#) (which was agreed by Cabinet in January 2024) and will be used to inform Biodiversity Net Gain considerations on new planning applications.

¹ Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018-2021), and Department for Levelling Up, Housing and Communities. *Guidance – Natural Environment*. <https://www.gov.uk/guidance/natural-environment>

- 2.5 Beyond the planning process the LNRS has the potential to influence land management funding schemes and the emerging market for habitat banks, this is because most of the proposals in the LNRS will be delivered on private land holdings.
- 2.6 Following consideration of the Draft LNRS officers have drafted the Council's proposed consultation response which is attached at **Appendix B** for approval by Cabinet. By the time of Cabinet, it will have been considered by Planning Policy Board at its meeting of the 28 May and Policy & Performance Improvement Committee at its meeting on 2 June 2025, and the results of these discussion will be reported to Cabinet at the meeting. Alongside the response officers are preparing more detailed suggestions for potential additional areas for grassland measures to be applied to.
- 2.7 The publication of the final LNRS for consideration by SAs will be in September and unfortunately this will not tie in with the Council's Cabinet timescales. Therefore, it is proposed that the Portfolio Holder, following consultation with Planning Policy Board, will comment on the final LNRS, setting out whether the Council objects or not to the publication.

3.0 Implications

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate.

3.1 Financial Implications – FIN25-26/978

No financial implications have been identified.

Legal Implications - LEG2526/6610

- 3.2 As a supporting authority under the relevant legislation the District Council has a role to play in authorising the publication of the final Nottinghamshire & Nottingham Local Nature Recovery Strategy. As the timeframes will not facilitate the document returning to Cabinet for final consideration it is considered appropriate that delegated authority be given to the Portfolio Holder for Climate and Environment to respond on the Council's behalf following appropriate consultation with the Planning Policy Board.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

[Mandatory Biodiversity Net Gain Strategic Significance Policy](#)

Catherine Mayhew
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Nottingham NG2 7QP

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Email: matthew.norton@newark-sherwooddc.gov.uk

Our ref:9-4-25 ltrr NCC LNRS

Sent by email to: LNRSNN@nottscc.gov.uk

9 April 2025

Dear Catherine

RE: NOTTINGHAMSHIRE & NOTTINGHAM LOCAL NATURE RECOVERY STRATEGY – PROVISION OF CONSULTATION DRAFT TO SUPPORTING AUTHORITIES

Thank you for the opportunity to review the draft Local Nature Recovery Strategy (LNRS), prior to the commencement of public consultation. We do not wish to raise any objection to the LNRS going out to public consultation.

As you know we have had opportunity to raise a number of issues with you before this formal stage on various aspects of the LNRS and the proposals contained within it. We are pleased to see that the issues which we discussed have been addressed to the extent that they can be at this stage and look forward to addressing some of the more detailed issues as the LNRS is progressed. Please find attached our current observations on the LNRS based on our previous conversations and areas of the document where we believe further issues need to be addressed.

We look forward to working together on finalising the LNRS.

Yours Sincerely

Matthew Norton
Business Manager – Planning Policy & Implementation

Newark & Sherwood District Council – Current Observations on the Draft LNRS

The District Council provided a detailed response to your initial consultation in our report dated February 2025. This was then followed up with a TEAMS meeting on 07 March 2025.

The following summarises the Council's current position to highlight areas we consider are still of some concern, and which we consider will need addressing before final publication to enable a recommendation to be put before Cabinet for approval. The first part deals with the issues raised in our February response, the second part considers other issues arising from your most recent consultation.

1. Overlap with sites allocated for development in the relevant local plan

- Subsequent amendments have mostly addressed our initial concerns.

2. Overlap with existing built development

- This mainly involves the buffering approach that has been taken for measures relating to watercourses. This remains as mapped, and we still consider this does not look good visually.

3. Overlap with the Laxton Conservation Area

- This has been addressed by removal of measures from within the conservation area.

4. Poor Representation of Grassland Measures

- As agreed, we are re-evaluating this layer and anticipate suggesting additional areas. These will be provided in a further response with the hope that our suggestions will be accepted and included in the public consultation mapping.

5. Application of Mapping Methodology

- We still have concerns regarding this based on our comments below regarding the Wet Woodland layer.

6. Wet Woodland Layer

Whilst there seems to have been some amendment to this layer, this is still showing many areas where we consider it unlikely that creation of this habitat type would be feasible. On that basis it remains unclear as to how mapped areas have been fully assessed using the mapping methodology and appears to have just been an imported data set. Therefore we continue to have concerns.

7. Strategy Document

Section 1.9 Page 14 states that “...*there is a requirement to review every 3-10 years*”. We consider that this needs to be set period (e.g., every 5 years) so that this can be taken into consideration when plan making.

9 April 2025



Nottinghamshire and Nottingham Local Nature Recovery Strategy (LNRS)

NSDC Response to the public consultation on the draft LNRS

May 2025

1.0 Introduction

- 1.1. In February 2025 we commented on a pre-public consultation in our document titled *NSDC Response to consultation on initial draft mapping of "Areas that Could Become of Particular Importance for Biodiversity"* which, for context, should be read in conjunction with these comments. Many of the concerns we raised were subsequently addressed in advance of the public consultation. Where we still have concerns or matters requiring clarification these have been brought forward into this, our comments on the draft LNRS.
- 1.2. Sections 2.0 to 7.0 below reconsiders the points previously raised. In Section 8.0 we provide additional comments on the published draft LNRS.

2.0 Overlap with sites allocated for development in the relevant local plan

- 2.1. We previously raised concerns that the mapping process had not taken due account of allocated sites in Newark & Sherwood Local Development Framework Allocations & Development Management Development Plan Document¹ or the strategic growth areas.
- 2.2. Our earlier concerns have largely been addressed in the public consultation version of the Habitat Map. Where overlaps remain in the Newark Area Policy 2 (NAP2) area, this is considered acceptable and proportionate in respect of anticipated delivery of biodiversity enhancements within the strategic sites.

3.0 Overlap with existing built development

- 3.1. Again, mindful that a buffer approach had been taken with 'rivers' habitat, we noted that aside from this habitat, there were numerous instances where 'Areas that Could Become of Particular Importance for Biodiversity' (ACBs) had been mapped over existing built development. We had not examined the extent of these the same as we had done for allocated sites due to their frequency but considered this required further consideration as it seemed illogical to have ACBs that cover existing built development.
- 3.2. The extent to which this continues to occur is much reduced in the public consultation Habitat Map but still occurs frequently in relation to the mapped measures C/M6, C/M7 and C/M9:
 - *C/M6_ Establish a mix of shading conditions along watercourses to reduce water temperatures, through management of existing trees and establishment of new trees and woodland;*
 - *C/M7_ Undertake favourable management of the riparian zone, including by minimising the impacts of mechanical vegetation clearance and establishing marginal vegetation where absent, where appropriate; and*
 - *C/M9_ Renaturalise watercourses where appropriate, including by de-channelising, removing redundant hard engineering, reinstating meanders and braiding (if*

¹ Newark and Sherwood District Council. (2013). *Newark & Sherwood Local Development Framework Allocations & Development Management Development Plan Document – Adopted July 2013*.
<https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/your-council/planning-policy/supplementary-planning-information/allocations-and-development-management-dpd/Allocations-and-Development-Management-Development-Plan-Document.pdf>

feasible), and creating backwaters and allowing existing natural processes to continue.

- 3.3. This has arisen from the fact that a buffering approach has been taken in relation to watercourses, with a 50m buffer either side of a watercourse applied. Invariably, this process has likely been influenced by the fact that once a watercourse has been mapped, the process of applying such a buffer can be automated within the Geographic Information System (GIS) used for the mapping.
- 3.4. We still consider that it is illogical to have mapped measures covering existing built development, particularly when, as is the case here, that the mapped measures have no relevance in the context of existing built development. The exception might be C-M9 where future redevelopment might create opportunities to de-culvert watercourses, but this would be better considered as an overarching measure. However, we make this comment acknowledging that the process to refine the mapping for these mapped measures would likely be time-consuming.
- 3.5. This overlap also occurs with the overarching potential measure A/M2 '*Target habitat enhancement and creation in areas where this will reduce fragmentation and increase ecological connectivity, through the creation of linkages, corridors and stepping stones*'. This mapped measure covers several settlements. However, in this instance as this covers wide generic areas and has a more generic objective it is more intuitive for the mapping to be similar in nature and to incorporate settlements. Consequently, we are more comfortable when overlap occurs with this measure.

4.0 Overlap with the Laxton Conservation Area

- 4.1. This has been addressed prior to the public consultation by removal of the measures within the conservation area.

5.0 Grassland

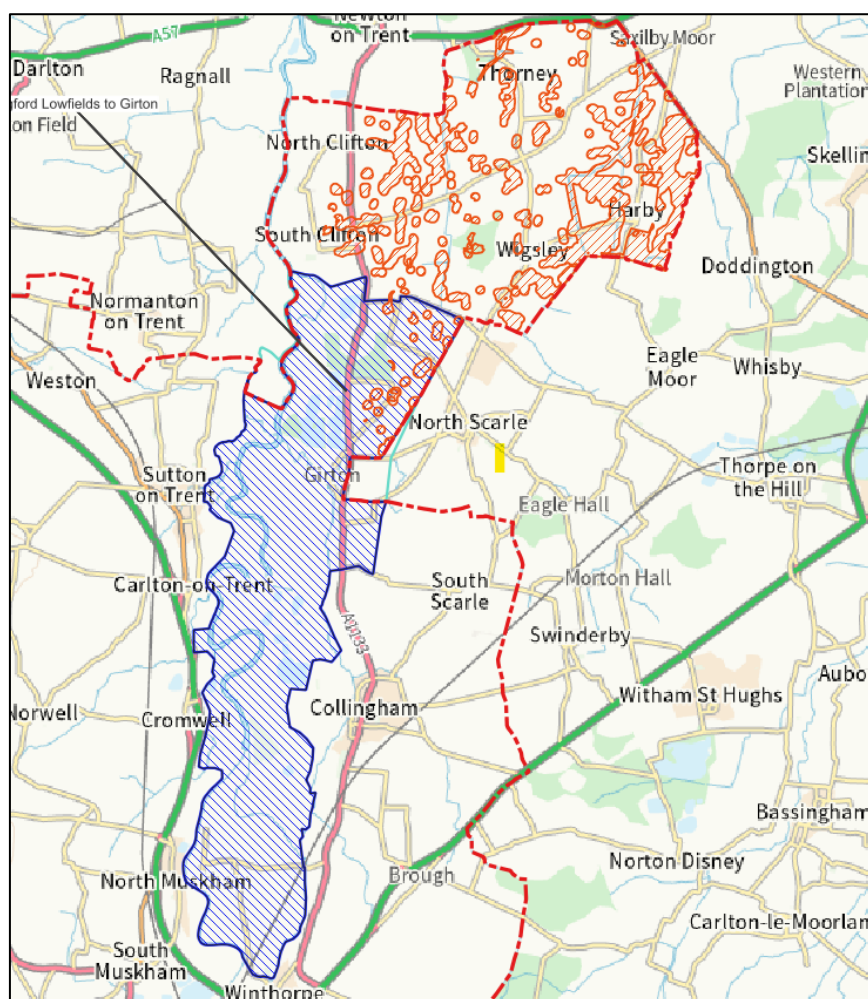
- 5.1. Following our concerns that grassland habitats appeared to be poorly represented in key areas of the Newark and Sherwood District, particularly in the Biodiversity Opportunity Mapping (BOM) 'Mercia Mudwoods Focal Area' and 'The Dumbles Focal Area', it was agreed that NSDC would propose additional areas to be mapped under the relevant grassland measures.
- 5.2. As part of the process leading to the consultation stage we had unsuccessfully tried to promote some grassland areas using the LNRS mapping methodology. So in this instance we have taken a simple, and we consider logical, method for selection of additional areas to be mapped. This is based on the designated Local Wildlife Site system. Where grassland habitat is noted as a feature of the designation, and there appears from aerial imagery to be the potential for expansion of the habitat on adjacent land, either through creation of new species-rich grassland or enhancement of existing grassland, we have mapped those areas. We will then leave it to the LNRS team to decide whether these are acceptable in terms of the methodology, but request that an explanation is provided for each area as to why it has not been carried forward to the final published Habitat Map.
- 5.3. These additional areas have been provided separately as a GIS layer.

6.0 Application of Mapping Methodology

- 6.1. We have previously raised concerns regarding the mapping methodology. The example we used to highlight this was associated with the mapped measures for wet woodland. It was consequently acknowledged by the LNRS team, that there were particular problems with an imported third-party data set used for that habitat. Whilst this provided a reasonable explanation to our specific query, this wet woodland layer continues to be of concern as discussed in the following section.

7.0 Wet Woodland Layer

- 7.1. In our previous comments we highlighted concerns regarding the 'wet woodland layer' provided as part of the early consultation stages with supporting authorities. As noted above, the LNRS team acknowledged that there were issues with the underlying dataset.
- 7.2. To illustrate our concerns, one of the areas we focussed on was a large area at the north of the district in the Clifton, Thorney, Harby area. This is shown as brown hatched areas on the extract below which we included in our comments. The blue hatched area is the BOM Langford Lowfields to Girton Focal Area.



- 7.3. In the public consultation draft, these brown hatched areas are now mapped as B/M5 Strategic habitat creation as part of large-scale development, creating more habitat and better ecological connectivity at a landscape-scale. They also form part of B/M4

Installation and retrofitting of features to reduce fragmentation caused by roads and railways, including underpasses and green bridges at key locations.

- 7.4. From a strategic plan making process, the general location, geography and current land-use for this area is such that large-scale development is extremely unlikely in this area. The one exception might be solar array developments, but in that case the creation of woodland habitat as part of the development is usually very limited because of the need to avoid shading of the solar panels. Also, this is not an area where we would consider that there has been significant fragmentation caused by transport links. Consequently, the mapping of these measures in this area, on the basis that they have, seems illogical and counter-intuitive to the need for measures to be ‘...*practical, realistic and deliverable*’ as set out in the draft Statement of Biodiversity Priorities. Consequently, we continue to have concerns for how these measures have been mapped in this area, as it seems to be at odds with the key principles of the LNRS, which then has the potential to influence overall confidence in the mapping procedure.

8.0 Relationship with Biodiversity Net Gain

- 8.1. The draft Statement of Biodiversity Priorities outlines the relationship with the LNRS and Biodiversity Net Gain (BNG). The main effect will be that the published LNRS will, through legislation, determine how the ‘strategic significance’ multiplier must be set when undertaking BNG calculations using the Statutory Biodiversity Metric (SBM).
- 8.1. The Draft Statement of Biodiversity Priorities states how “...*a purpose of the LNRS is to help to influence the location of BNG that is delivered at off-site locations.*” However, the LNRS will also determine how the strategic significance multiplier must be used when calculating the baseline habitat assessment and the post-development onsite biodiversity values. How this should be done is set out in the relevance guidance² and is summarised in Table 7 of that guidance which is reproduced below.

² DEFRA. (2024). *The Statutory Biodiversity Metric User Guide – July 2024*.
https://assets.publishing.service.gov.uk/media/669e45fba3c2a28abb50d426/The_Statutory_Biodiversity_Metric_-_User_Guide_23.07.24_.pdf

Table 7 Biodiversity metric strategic significance categories and score applied in the metric where an LNRS has been published

Category	Score	Description
High (Formally identified in local strategy)	1.15	<p>This category can be applied when:</p> <ul style="list-style-type: none"> the location of the habitat parcel has been mapped in the Local Habitat Map as an area where a potential measure has been proposed to help deliver the priorities of that LNRS; and the intervention is consistent with the potential measure proposed for that location <p>If your project delivers the mapped potential measure set out in the LNRS you should:</p> <ul style="list-style-type: none"> record strategic significance as low in the baseline record strategic significance as high in post-intervention sheets record that you have applied the published LNRS in your gain plan
Medium	1.10	This category cannot be applied.
Low (Area / compensation not in local strategy)	1	<p>Where the definitions for high strategic significance are not met.</p> <p>Even if your project is an area mapped with a potential measure, if it does not deliver the specific actions outlined for your location you should record strategic significance as low.</p>

- 8.2. Consequently, this is where this aspect of the LNRS will be mostly used in terms of mandatory BNG. This is of particular importance and concern to us, as this will potentially have a major impact for the Local Planning Authority (LPA) who are now having to review many hundreds of submitted metric calculations annually, as opposed to a very small number of calculations (measured in single figures) for calculations associated with off-site habitat banks.
- 8.3. If a SBM calculation supporting a development proposal considers that something happening on site constitutes a mapped measure for that location they can then apply the 'high' category, which will then generate a higher value than would otherwise have been the case, thereby reducing the number of biodiversity units required to meet the mandatory minimum 10% measurable net gain. For this reason, it is inevitable that SBM calculations will, wherever possible, attempt to justify that what is being provided meets a mapped measure in that location. To ensure that the objectives of the LNRS are met, we consider it important that the LNRS guides the use of the mapped potential measures in SBM calculations with clarity and lack of ambiguity. This is also important to ensure that the LPA and applicants do not have to engage in protracted

discussions regarding whether the strategic significance multiplier has been applied appropriately or not.

- 8.4. On face value, application of the correct strategic significance multiplier should be straightforward; simply cross reference habitats being used in the SBM calculation with the LNRS Habitats Map, and then cross-reference the proposed habitat creation and/or enhancement being proposed with the relevant mapped potential measures for that habitat type. We consider it will be far from simple.
- 8.5. Each section of the broad habitat type and potential measures section starts with a statement of which priority habitats are covered, and which other habitats are covered as shown in the extract below for the Grassland Priorities and Potential Measures:

F - Grassland Priorities and Potential Measures	
Priority Habitats covered:	Lowland calcareous grassland, lowland meadows (lowland neutral grassland)
Other habitats covered:	Other semi-improved grassland
Related habitats:	N/A

- 8.6. The SBM utilises the UKHab habitat classification system. Therefore, when undertaking a SBM calculation there is a need to translate the UKHab habitats being used within the calculation with the habitat types used within the LNRS. And it is here that there is potentially problem which we discuss below using Grassland habitat as an example.
- 8.7. The UK Biodiversity Action Plan (BAP) descriptions^{3,4} for lowland calcareous grassland highlight which National Vegetation Classification (NVC) communities the habitat encompasses and close associations with these NVC communities is considered a prerequisite for the UKHab g2a 'lowland calcareous grassland' habitat type⁵. However, there is also the UKHab g2c 'other calcareous grassland' habitat type, with the UKHab definition noting that this is "...calcareous grassland that does not meet the definition of either g2a or g2b..." and which also needs to meet other criteria.
- 8.8. The SBM has just two types of calcareous grassland 'lowland calcareous grassland' and 'upland calcareous grassland'. So, only one type (the former) would be applicable in the LNRS area. So if a development SBM calculation is dealing with g2c 'other calcareous grassland' is this a grassland type that the LNRS considers is applicable to the Grassland Mapped Measures? There is then a further complication in that it could be argued that this would need to be entered into the SBM as 'lowland calcareous grassland' but this is a high distinctiveness habitat, as it represents the lowland calcareous grassland priority habitat (i.e. Habitat of Principal Importance), which g2c isn't. Therefore, is g2c considered by the LNRS to be 'other semi-improved grassland'.

³ UK Biodiversity Group. (1998). *UK BAP Habitat Action Plan – Lowland Calcareous Grassland*. <https://webarchive.nationalarchives.gov.uk/ukgwa/20110303150119/http://www.ukbap.org.uk/UKPlans.aspx?ID=12>

⁴ BRIG, (Ed. Ant Maddock). (2008). *UK Biodiversity Action Plan Priority Habitat Descriptions – Updated December 2011*. <https://data.jncc.gov.uk/data/2728792c-c8c6-4b8c-9ccd-a908cb0f1432/UKBAP-PriorityHabitatDescriptions-Rev-2011.pdf>

⁵ UKHab Ltd. (2023). *UK Habitat Classification Version 2.0*. <https://www.ukhab.org/>

8.9. The term semi-improved grassland arose as part of the Phase 1 habitat classification and methodology published by the Nature Conservancy Council in 1990 with subsequent minor updates⁶. For calcareous grassland there were two categories for semi-improved; poor semi-improved and good semi-improved. Within the technical data sections of the SBM there is a table that translates the JNCC Phase 1 habitat types to the relevant SBM habitat types which for our example are:

- Semi-improved calcareous grassland (Good quality) > 'Grassland – lowland calcareous grassland' (which is a priority habitat of 'high' distinctiveness); and
- Semi-improved calcareous grassland (Poor quality) > 'Grassland – modified grassland' (which is a grassland of 'low' distinctiveness).

8.10. The LNRS only references 'other semi-improved grassland'. Because 'modified grassland' (which is g4 'modified grassland' in the UKHab classification system) is considered to include 'poor semi-improved' grassland, and species-poor regularly mown amenity grassland typical of public open space areas, it could be argued that the creation of 'modified grassland' represents a grassland habitat type that is covered by the potential measures for grassland. When one then looks at the potential measures it can be seen that it would have to include 'modified grassland' as this is a specific grassland type that measures F/M2⁷, F/M3⁸ and potentially H/M2⁹ appear to target given that 'modified grassland' includes amenity grassland.

8.11. We have used lowland calcareous grassland as the primary example here simply because it is the first habitat listed under Grassland. Within the LNRS area, most grassland habitat within SBM calculations will concern neutral grassland, but the same situation occurs with this.

8.12. We assume that 'lowland neutral grassland' has been provided in parenthesis after lowland meadows to ensure that the LNRS is an accessible document to all as without this the lay reader would not be aware that 'lowland meadow' priority habitat encompasses neutral grassland communities distinct from calcareous and acid grassland communities.

8.13. Lowland meadow priority habitat is similarly defined by NVC communities and is represented in the UKHab habitat classification system by g3a 'lowland meadows' and within the SBM by 'lowland meadows' habitat. So this should be clear and unambiguous. But the potential measures also cover 'other semi-improved grassland'.

8.14. Like calcareous grassland the SBM provides a suggested translation as follows:

⁶ JNCC. (2010). *Handbook for Phase 1 habitat survey – a technique for environmental audit*. <https://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf>

⁷ F/M2 - *Bring unmanaged and neglected grasslands back into favourable management to increase species diversity, including field margins, buffer strips along watercourses, road verges, railways and amenity grasslands.*

⁸ F/M3 - *Increase the value of grasslands in public open space, and in other areas such as golf courses and cemeteries, including by relaxing mowing regimes and increasing species richness.*

⁹ H/M2 - *Carry out wildlife-friendly management of public green spaces (including parks, allotments, churchyards and cemeteries, road verges, walkways, watercourses, wetlands and woodlands), including by relaxing mowing regimes, establishing wildflower grasslands, planting native trees and shrubs, and creating ponds.*

- Semi-improved neutral grassland (Good quality) > 'Grassland – other neutral grassland' (which is a priority habitat of 'medium' distinctiveness); and
- Semi-improved neutral grassland (Poor quality) > 'Grassland – modified grassland' (which is a grassland of 'low' distinctiveness).

8.15. Also, the aforementioned mapped measures F/M2, F/M3 and H/M2 will apply to modified grassland that is neutral in nature.

8.16. This means that when LPA ecologists are reviewing submitted SBM calculations for **each habitat parcel** they will need to:

- a) Check each habitat parcel on the pre-development baseline, and for the post-development scenario to see if it is a habitat type that potentially correlates with an LNRS habitat type for which there are mapped measures at that location.
- b) If there are mapped measures for the habitat type, to then decide if proposed habitat creation and/or enhancement and the target habitat condition correlates with the relevant mapped measure. Here there is likely to be numerous differences of opinions between the reviewing LPA ecologist and whoever prepared the SBM arising from simple differences of professional opinion and the fact that it will be advantageous for the development to try and demonstrate that it is delivering mapped measures because this will then reduce the amount of BNG units needed.

8.17. This potential issue was taken into consideration by NSDC when it prepared and subsequently adopted its document¹⁰, and associate Focal Areas Plan¹¹, that sets out how it considered the strategic significance multiplier should be used in SBM calculations during the interim period before the LNRS was published. This provides a clear reference as to what UKHab habitats apply. Whilst there is probably little that can be done to alleviate the inevitable additional burden that will be placed on LPA ecologists reviewing SBM calculations in respect of whether proposed delivery of mapped measures are acceptable or not, we consider that there is potential to partially mitigate this burden by the addition of an Appendix to the LNRS linked to the Priority Habitats and Other Habitats, listed for each broad habitat type, similar to that used in the NSDC document, which provides a clear definition of which UKHab and SBM habitat are applicable.

8.18. This issue is then further compounded by the Overarching Priorities and Potential Measures which are stated to cover all Priority Habitats and all Other Habitats, which could reasonably be interpreted as being any habitat. Whilst there are fewer potential measures than for the broad habitat types, we anticipate that A/M2 *"Target habitat enhancement and creation in areas where this will reduce fragmentation and increase ecological connectivity, through the creation of linkages, corridors and stepping stones"* is likely to become a particular focus of attention, with habitat creation and enhancement measures proposed in a way that it was most likely not intended by the

¹⁰ <https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/your-council/planning-policy/other-planning-policy-information/biodiversity-and-landscape/Mandatory-Biodiversity-Net-Gain---Strategic-Significance-Policy.pdf>

¹¹ <https://www.newark-sherwooddc.gov.uk/media/nsdc-redesign/documents-and-images/your-council/planning-policy/other-planning-policy-information/biodiversity-and-landscape/Mandatory-Biodiversity-Net-Gain---Strategic-Significance---Focal-Areas-Plan.pdf>

LNRS, and which are no more than 'token gestures', but which LPA ecologists will find difficult to argue against.

- 8.19. Therefore, in summary. We consider that the lack of correlation in the terminology for habitats used in the Priorities and Potential Measures with the Statutory Biodiversity Metric and the UKHab habitat classification system will result in additional burdens for ecologists preparing BNG calculations, and for the local planning authority when reviewing calculations. We also consider that this will lead to developments being able to include 'token measures' towards the delivery of mapped measures with the benefit of a reduced number of BNG units being needed by the development.

- 8.20. Section 2.3 of the draft Statement of Biodiversity Priorities states that:

"This effectively means that less BNG needs to be provided if off-site provision is on a site identified in the LNRS (where the relevant habitat is being created or enhanced) and will incentivise developers to focus their off-site BNG in the places where it will have the biggest impact for nature recovery.

We consider this is misleading. The effect for offsite habitat banks is that this means more BNG units can be delivered per unit of area. It has no effect on the amount of BNG units required offsite by a development proposal.



Report to: Cabinet Meeting: 10 June 2025

Portfolio Holder(s): Councillor Simon Forde, Climate & the Environment
Councillor Paul Peacock, Strategy, Performance & Finance
Councillor Lee Brazier, Housing

Director Lead: Matt Finch - Communities and Environment

Lead Officer: Carl Burns, Transformation & Service Improvement Manager, Ext. 5293

Report Summary	
Type of Report	Open Report / Key Decision
Report Title	Review of the Council's Carbon Net Neutral Target
Purpose of Report	This report introduces the latest review of the Council's carbon footprint and provides recommendations for next steps in our climate strategy action plan.
Recommendations	<p>Following a review requested by Members through the Community Plan, it is recommended that:</p> <ul style="list-style-type: none"> a) the 2035 carbon net neutral target within the current scope is retained; and b) Members note the potential to set a 2050 target for housing, but that this is not progressed pending a review by the new local authority entity covering Newark & Sherwood following Local Government Reorganisation in 2028.
Alternative Options Considered	To maintain the 2035 target but include housing; and to advance the Council's net zero target to 2030 (corporate emissions only).
Reason for Recommendations	<p>This work aligns with the Council's Community Plan ambition to "reduce the impact of climate change and protect and enhance green spaces".</p> <p>There is a specific activity under this ambition to 'Further develop and deliver a Council-wide decarbonisation plan for our built assets/deliver a programme of prioritised decarbonisation actions, in response to the Carbon Trust report 2025, following engagement with stakeholders.'</p>

1.0 **Background**

- 1.1 Newark & Sherwood District Council (NSDC) declared a Climate Emergency at the Full Council meeting of 16 July 2019. At this stage, the declaration did not include a target for net zero for the Council but recognised that the UK Government had, the preceding month, agreed a target of 2050.
- 1.2 NSDC worked with the 'Carbon Trust' in 2020 to establish a climate emergency action plan which included the development of an emissions baseline, a 2035 carbon neutrality target and a pipeline of carbon reduction interventions. The work also included an assessment of the emissions associated with Housing, and a high-level review of the potential retrofit strategies/costs that would be required to achieve carbon neutrality of housing emissions under various pathways (e.g., 2030, 2035, 2040). The decision was taken not to include Housing in the target given the relative scale of emissions (>80% of total measured emissions) and associated costs and challenges involved.
- 1.3 After being appointed in May 2023, the incoming Climate Change Portfolio Holder expressed a desire to reassess the Council's carbon neutrality target. In the interests of consistency and best practice the 'Carbon Trust' were again commissioned to calculate the Council's existing baseline and to develop an options analysis for both **a.** the feasibility of bringing the 2035 target forward to 2030 (with the existing boundary of emissions: gas, electricity, water, waste, fleet). Or **b.** the feasibility of integrating the Council's housing stock into the existing 2035 target. (Following discussions with the housing team, a target date of 2050 was also explored).
- 1.4 £56,325 was committed from the Capital Project Feasibility Reserve to complete the work and a project team made up of key officers from across the Council in addition to the elected members listed below. The group met three times throughout the review process.
 - a. Cllr K. Melton – Climate Change Portfolio Holder (May 2023 – Sept 2024)
 - b. Cllr P. Peacock – Leader of the Council
 - c. Cllr L. Brazier – Housing Portfolio Holder
 - d. Cllr R. Holloway – Leader of the Conservative Group (May 2023 – Dec 2024)
 - e. Cllr M. Pringle – Chair of Policy & Performance Improvement Committee
 - f. Cllr E Oldham – Climate & Environment Portfolio holder (Sept – Dec 2024)
 - g. Cllr S. Forde – Climate & Environment Portfolio Holder (Dec 2024 -)
 - h. Cllr R. Jackson – Deputy Leader of the Conservative Group (Dec 2024 -)
- 1.5 The Carbon Trust have now completed their work which can be found at **Appendix A** and is being presented for consideration and approval, after endorsement by the working group in March 2025.

2.0 Proposal/Details of Options Considered

2.1 **Current footprint of NSDC and how it compares with 2019**

The review used baseline data for the year 2023/24 to calculate the Council's carbon footprint which is made up of two main parts. 'Corporate emissions' (Council operations) and 'housing emissions' (emissions from the Council's housing stock). In terms of the Council's operations its total emissions for this period were 9,267 tCO₂e. However, this includes scope 3 emissions which total 6,393 tCO₂e and comprises of emissions from the treatment of waste and wastewater, water usage, business travel, commuting and purchased goods & services (PG&S) which are largely outside of the Council's control at this time. Therefore, the proposed targeted baseline for reduction is set at 3,779 tCO₂e. This baseline figure includes the following:

Scope 1 emissions, which arise from natural gas and diesel combustion in NSDC's buildings and fleet, total 2,287 tCO₂e.

Scope 2 emissions, arising from electricity usage almost entirely from buildings, totalling 587 tCO₂e, and

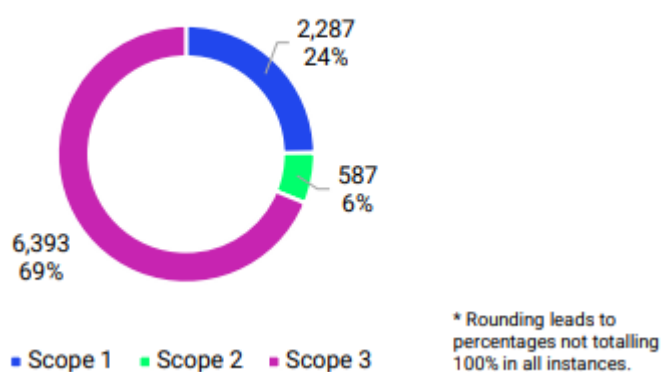
(selected) Scope 3 emissions, upstream emissions associated with the extraction, refinement and distribution of fuels and electricity, classified as "upstream energy related activities" contribute 658 tCO₂e

*These emissions also fall under the Scope 3 total of 6,393 tCO₂e.

Additional Emissions associated with services such as water - 241 tCO₂e and Waste – 6 tCO₂e

Further details of this can be seen on page 5 of the report at appendix a.

Total NSDC emissions by source, 2023/24*



The chart over illustrates how this compares with the review which was completed in 2019:

NSDC's 2035 carbon neutral target	Emission source	2019 emissions (tCO ₂ e)	2024 emissions (tCO ₂ e)
	Electricity	715*	777 (+9%)
	Fleet	1,058*	1,415 (+34%)
	Natural gas	715*	1,340 (+87%)
	Water	10	241 (n/a)
	Waste	11	6 (-39%)
	Total:	2,510	3,779 (+51%)
	Other sources:		
	Housing	15,645 (direct emissions only)	17,315 (direct emissions only) 19,921 (including WTT)
	Purchased goods and services	280	5,074
	Business travel	49	86
	Leased buildings	408	198
	Commuting	108	130

* Updated to include Scope 3 emission sources however methodology in calculation is different than that used in 2019

- 2.1.1 The review shows a significant reduction in our waste emissions (39%) however an increase of 51% in our overall emissions are evident. It is worth noting however that during this period there has been an increase in the Council's operations and workforce, most notably an increase in fleet which was necessary in order to deliver the glass recycling service. Also, the increase in our natural gas emissions is higher at +87%, this can in part be explained as a result of Southwell leisure centre being included in the 2023/24 emissions whereas it wasn't included in 2019. An increase in the number of buildings under the Council's control have factored in most areas but mostly the rise can be explained by enhancements and accuracy in calculation methodology utilised by the Carbon Trust in the current calculation that were not available in 2019.

2.2 Local Government Reform (LGR)

Whilst the review work was being undertaken Government announced its plans for a Local Government Review. Whilst there are several scenarios submitted for consideration all will result in NSDC no longer being an entity and would therefore require a full review of carbon neutrality targets (in addition to other key strategies) to be conducted by the new unified authority. With the likely transition to a unified authority beginning in 2028 it is proposed that it is not reasonable to commit to a new non-statutory target and increase in financial liabilities beyond the life of the current Council.

The current targets set by other Nottinghamshire authorities are listed below:

Bassetlaw

- To meet Net Zero council operations by 2030
- To meet Net Zero areawide emissions by 2045

Broxtowe

- To become carbon neutral by 2027 for the Council's own operations.
- To align to the UK's net zero Commitment of 2050 for the Borough and establish the actions and potential budget required to achieve this (working to an earlier date if possible)

Gedling

- Achieve net-zero carbon emissions by 2030.

Mansfield

- Reduce carbon emissions by 40% by 2030
- Make Mansfield carbon neutral by 2040

Rushcliffe

- Carbon neutral by 2030 for its own operations.

Nottinghamshire County Council

- Carbon neutral by 2030 for its own operations

Ashfield

- net-zero by 2030 for the emissions 'they are responsible for'

2.2.1 Whilst we don't have an update on each councils' performance to date, all will have different methodologies scopes and baselines. It is likely that progress for each authority will also be mixed and therefore this will be a significant piece of work for the new entity post 2028 to set a single methodology baseline and target post vesting day. A national target for delivering net neutral exists at 2050 so housing could theoretically be given the same timescale. However, it would be up to the new entity to explore whether this target could be advanced.

2.3 **Option A: Maintain 2035 target but include housing**

NSDC's housing stock is not currently included in our 2035 net zero target. Following this review, it is noted that the baseline emissions for the Council's housing is at 19,921 tCO₂e, with 75% of emissions from heating sources. Of these total emissions, 17,315 tCO₂e are attributed to direct emissions i.e. excluding those from Well to Tank (WTT).

2.3.1 It is noted that 97% of the Council's housing stock currently rely on burning fossil fuels such as gas, oil, LPG with the remainder using electrical sources such as air source heat pumps (ASHP) or electric boilers.

2.3.2 To significantly reduce the emissions of our housing stock at this time substantial financial investment would be required. For example, the 'high retrofit' program required would see all houses receive extensive energy efficiency measures and be heat decarbonised by 2035. However, the financial implications of this option would mean a capital commitment of £145m (£14.5m per year not adjusted for inflation). There are also resource implications to this option. Currently the housing team have completed circa 107 houses in their retrofit program. In order to deliver net zero across the Council's housing stock by 2035 the team would be required to deliver 560 houses per year consistently. This would not be feasible without a full review and enhancement of the current structure of the team and would be increasingly difficult due to the evident lack of buy in across the Council's tenant base in addition to supplier shortages nationally.

2.3.3 In the meantime, the Council has and will continue to bid for funding to decarbonise both social and private rented housing through schemes such as the Warm Homes Social Housing Decarbonisation Fund (social rented) and the Local Grant (private rented sector) and has recently received an indicative allocation to continue to retrofit energy saving measures to both reduce carbon and where able, reduce running costs for tenants and residents. It is fair to say that demand for such schemes far outweighs

the bids submitted and the latest round has seen allocations for NSDC reach 50% of the bid.

- 2.3.4 Work is also ongoing to update stock condition information and energy performance information to ensure our rented housing stock data is accurate and current. This also enables the Council to model the positive impact of measures on lower performing homes so these homes can be prioritised these homes funding or budgets are available.

- 2.3.5 **Local Area Energy Plan (LAEP)**

Whilst we are not recommending that housing is included within the current target and scope, work is taking place to understand how housing can be decarbonised over the longer term. This work is being picked up under a LAEP which is a 'where and when' masterplan identifying the most cost-effective pathway for the local area to reach net zero and realise local benefits. It is data driven and is a whole energy system, evidence-based approach that is led by local government and developed collaboratively with defined stakeholders.

- 2.3.6 Work is well underway in this project and NSDC are providing data and regularly contributing to workshop discussions with key stakeholders in the region. The outcome which is expected later this year will include 3D modelling of the district which will map all buildings showing their current energy usage/efficiency ratings. This will enable a more targeted approach to the Council's retrofit program for example and help to provide the best account of social value in addition to directing key funding streams toward areas of deprivation and those experiencing fuel poverty.

- 2.4 **Option B: advance the Council's net zero target to 2030 (corporate emissions only)**

NSDC's current asset renewal plan is forecast with the 2035 target in mind and this is reflected in its MTFP. Any advancement of this target would require additional capital spend of at least £2.2m (not including inflation or borrowing costs). Whilst this option is in theory feasible the interventions required to deliver this target are not thought to be practicable, efficient or necessary. For example, delivering the suggested carbon savings at the Council's Newark Sports & Fitness site would require the total replacement of the heating system on site which itself has only been installed since 2016. The current life of that system is not due to expire before 2031. The reduction of carbon emissions is already factored into the Council's asset renewal plan which will see systems replaced at 'end of life' with greener options where feasible and safeguards value for money from investments already made.

- 2.4.1 The Council's Solar PV installation program has further reduced its carbon footprint from scope 2 electricity usage across 7 of its assets. These changes are not reflected in the report at appendix a as the installation was ongoing through the review period. The recommendations detailed in the Carbon Trust's report also rely on installing Solar PV to sites which have previously been deemed unsuitable throughout the Council's current installation program, namely Blidworth Leisure centre. The Council's current climate strategy action plan currently includes initiatives that aim to significantly reduce its emissions within current forecast budgets. For example, work is well underway to convert the Council's fleet to Hydro-treated Vegetable Oil (HVO) which will see the current fleet emissions, reported at 1415 tCO₂e, reduced by up to 90%.

- 2.4.2 Moreover, whilst the recent commitment to the wider woodland regeneration scheme will deliver significant carbon offsets these will not be seen until the trees reach maturity and therefore will not be available towards a target of 2030. This would mean that there would be residual carbon that would require carbon credits costing at least 38k in 28/29 and 29/30 which is beyond the life of NSDC in LGR terms.

2.5 **Recommended option: Maintain 2035 target and business as usual**

The current baseline for carbon emissions is 3,779 tCO₂e and this option would see the current net zero target of 2035 maintained. Initiatives already considered by NSDC, such as HVO for fleet (90% emissions reduction) and a green tariff for electricity are expected to be in place within 2025. These will deliver sufficient carbon savings that will give the Council the best chance to meet the 2035 target.

2.5.1 **Clean Power 2030 Action Plan: A new era of clean electricity**

On 7 April 2025 the Department for Energy Security & Net Zero released their plans for 'Cleaning up the U. K's power system' and their proposal states that this as 'central to decarbonising the whole economy'. The policy update states that a clean electricity supply, the electrification of heat, transport and industry open up routes to net zero.

If successful, this commitment would further reduce the Council's carbon footprint caused by scope 3 (upstream) emissions associated with the extraction, refinement and distribution of fuels and electricity.

Actions	Forecast annual CO ₂ saving (tCO ₂ e)
Replace all diesel fuel in our fleet with Hydrotreated Vegetable Oil (HVO)	1,274 (90% of fleet emissions)
Adopt green electricity tariffs across our assets and the decarbonisation of the grid	1,800 tCO ₂ e
Installed Solar PV installations across 7 assets (These will generate over 470.000 Kwh of electricity per year)	100 tCO ₂ e
Committed to the Woodland regeneration scheme (offsetting)	845 tCO ₂ e (median once trees have matured)
Total	*4,019 tCO₂e

*Approximate figures based on expected carbon reduction/offsetting

- 2.5.2 In 2019 the Council agreed to reduce their carbon footprint as much as feasible and targeted becoming carbon neutral by 2035. Due to the ongoing commitment of the Council's Elected Members and Officers this is still an achievable target despite governmental legislative changes, the introduction of additional services such as glass collection and Southwell leisure centre becoming as a Council asset.
- 2.5.3 The 2035 target remains under constant review and through the annual climate update report, Members are able to monitor the Council's progress regularly. Should the situation arise by where the target could be advanced this would be brought forward for discussion and approval in the future. However, with the impending changes due under LGR it is proposed that the target remains extant at this time.

- 2.5.4 Further completed actions and ongoing initiatives that showcase the Council's commitment to meeting their 2035 net zero target can be seen within appendix b

3.0 **Implications**

In writing this report and in putting forward recommendations, officers have considered the following implications: Data Protection; Digital & Cyber Security; Equality & Diversity; Financial; Human Resources; Human Rights; Legal; Safeguarding & Sustainability and where appropriate they have made reference to these implications and added suitable expert comment where appropriate.

3.1 Financial Implications FIN25-26/(4661)

- 3.1.1 Since the Council declared a Climate Emergency in 2019, the Council has spent over £5.312m on a number of capital projects in order to reduce carbon emissions, reduce energy consumption and improve energy efficiency:

Scheme	Funding	Total
Decarbonisation of Council Assets Feasibility works	Council	150,000.00
Climate Change Feasibility	Council	36,900.00
Decarb Devolution Council Houses	External Grant	612,609.87
Decarbonisation SDHF	50% Council 50% External Grant	2,358,341.05
Energy Efficient Boilers	Council	253,124.95
EPCs Council Houses	Council	55,673.33
EV Charge Points	External Grant	91,429.00
LED Lights	External Grant	64,526.30
PV Invertors Council Houses	Council	324,279.94
Solar PV Council Assets	Council	866,422.22
Warm Homes on Prescription	External Grant	498,197.99
Grand Total		5,311,504.65

- 3.1.2 Future schemes already within the existing Capital Programme include the following:

Scheme	Funding	Total
Decarbonisation Warm Homes: SHDF/LG	50% Council 50% External Funding	6,370,270.00
EPC	Council	1,724,050.00
Warm Homes on Prescription	External Grant	280,000.00
Woodland Planting Contribution	Council	309,915.00
Grand Total		8,684,235.00

- 3.1.3 Additionally to the capital items above, the 2025/26 revenue budget (and subsequent years) has sufficient funding approved within it in order to fund the switch to HVO fuel and the annual costs of running that type of fuel.
- 3.1.4 The costs identified within the Carbon Trust report relating to the potential works that could be undertaken are summarised in the table below:

	Total Cost	Annual MRP charge	Annual Borrowing charge	Total Borrowing (over 20 years)	Total Cost (principal plus borrowing)
Housing					
Housing 1 High Retrofit 2035	14,500,000	725,000	610,450	12,209,000	26,709,000
Housing 2 High Retrofit 2050	5,600,000	280,000	235,760	4,715,200	10,315,200
Housing 3 Light retrofit 2035	7,600,000	380,000	319,960	6,399,200	13,999,200
Housing 4 Light retrofit 2050	3,000,000	150,000	126,300	2,526,000	5,526,000
General Fund					
General Fund 1 Deep retrofit 2030	3,882,000	194,100	163,432	3,268,644	7,150,644
General Fund 2 Deep retrofit 2035	3,882,000	194,100	163,432	3,268,644	7,150,644
General Fund 3 light retrofit 2030	2,209,000	110,450	92,999	1,859,978	4,068,978
General Fund 4 light retrofit 2035	2,209,000	110,450	92,999	1,859,978	4,068,978

3.1.5 As can be seen above, the cost of completing further works identified within the Carbon Trust report would cost, as a minimum, £4.069m for the General Fund and £5.526m for the HRA.

3.1.6 There may be works that are identified as part of the strategic asset management replacement programme which, as assets come to the end of their useful life, are then replaced with alternative assets which will emit less carbon. Reports will be brought to Cabinet for approval of budget at that point in time.

3.2 Legal Implications (LEG2526/3139)

Cabinet is the appropriate body to consider the content of this Key Decision report.

Background Papers and Published Documents

Except for previously published documents, which will be available elsewhere, the documents listed here will be available for inspection in accordance with Section 100D of the Local Government Act 1972.

1. Portfolio Holder report - Climate Emergency Action Plan– Further scoping – June 2024
2. [Climate Emergency update – Policy & Finance Committee 24 Sept 2020](#)
3. [Clean Power 2030](#)

NEWARK AND SHERWOOD DISTRICT COUNCIL

Carbon Reduction Target Review

February 2025

Target Review

Executive summary

Introduction



Background

NSDC worked with Carbon Trust in 2020 to establish a climate emergency action plan which included the development of an emissions baseline, a 2035 carbon neutrality target and a pipeline of carbon reduction interventions. The work also included an assessment of the emissions associated with NSDC Homes, and a high-level review of the potential retrofit strategies/costs that would be required to achieve carbon neutrality of housing emissions under various pathways (e.g., 2030, 2035, 2040). The decision was taken not to include NSDC Homes in the target given the relative scale of emissions (c.80% of total measured emissions) and associated costs and challenges involved.

Since 2020, a number of carbon reduction measures have been progressed towards implementation such as Solar PV installations and EV charging infrastructure at NSDC corporate and leisure buildings. Additionally, NSDC's portfolio of assets has changed, most significantly with the integration of Southwell leisure centre, now under direct council control (meaning an overall increase in council emissions).

This project

New political **leadership at the council wishes to revisit the previous target commitments** to understand the feasibility of increasing ambition in relation to the **boundary of emissions and/or target dates**. NSDC are now looking to re-commission Carbon Trust to support with the following objectives:

1. Conduct **analysis to understand the feasibility of bringing the 2035 target forward to 2030** (with the existing boundary of emissions: gas, electricity, water, waste, fleet).
2. Conduct analysis to understand the feasibility of integrating the **housing stock (NSDC Homes emissions) into the existing 2035 target**. *Following discussions with the housing team, a target date of 2050 was also explored.*

Report Overview



This report provides details of the assessment carried out to evaluate decarbonisation target options for Newark and Sherwood District council (NSDC). The main sections of the report are as follows:

Carbon footprint overview (2023/24)

- Analysis and calculation of NSDC's carbon footprint for the 2023/24 period.
- Analysis of progress towards the existing 2035 target.
- Recommendations to improve accuracy of reporting.

NSDC Corporate decarbonisation

- Feasibility of decarbonising buildings owned and operated by NSDC, exploring potential phasing, costs and strategies.
- Feasibility of meeting 2030 or 2035 targets, building on existing work completed by BE DESIGN.

Housing decarbonisation

- Focuses on decarbonising housing owned by NSDC, exploring potential phasing, costs and strategies.
- Feasibility of achieving a 2035 or 2050 target for housing.

Target review

- Explores the feasibility of achieving different target dates for all emission sources (2030, 2035 and 2050), across different scenarios.

Next steps

- Summarises next steps and recommendations required to move forward with decarbonisation.

Carbon footprint overview



Here we provide NSDC corporate emissions from 2023/24 (FY) excluding NSDC Homes.

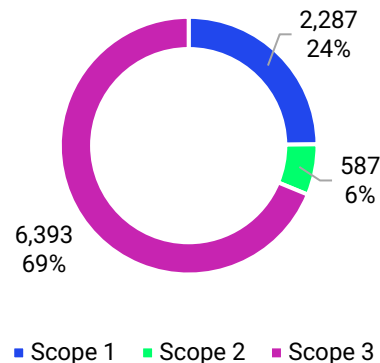
- Total NSDC emissions for the 2023/24 baseline year total **9,267 tCO₂e**.
- Scope 1 emissions, which arise from natural gas and diesel combustion in NSDC's buildings and fleet, total **2,287 tCO₂e**.
- Scope 2 electricity usage is responsible for **587 tCO₂e**, and arise almost entirely from buildings.
- The largest contribution to NSDC's footprint is from Scope 3 emission sources, totalling **6,393 tCO₂e**. This includes emissions from the treatment of waste and wastewater, water usage, business travel, commuting and purchased goods & services (PG&S).
- Upstream emissions associated with the extraction, refinement and distribution of fuels and electricity, classified as "upstream energy related activities" contribute **658 tCO₂e**. These emissions also fall under Scope 3.

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[Emission sources from 2023/24 have been compared with 2018/19 emissions here.](#)

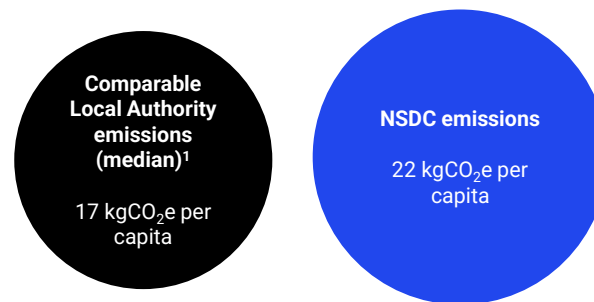
¹ Average LA emissions relate to the median Scope 1 and 2 emissions across all comparable CIPFA Neighbours Local Authorities, where data was publicly available. The emissions boundary and completeness of emissions reported are expected to vary considerably across each Local Authority.

Total NSDC emissions by source, 2023/24*



* Rounding leads to percentages not totalling 100% in all instances.

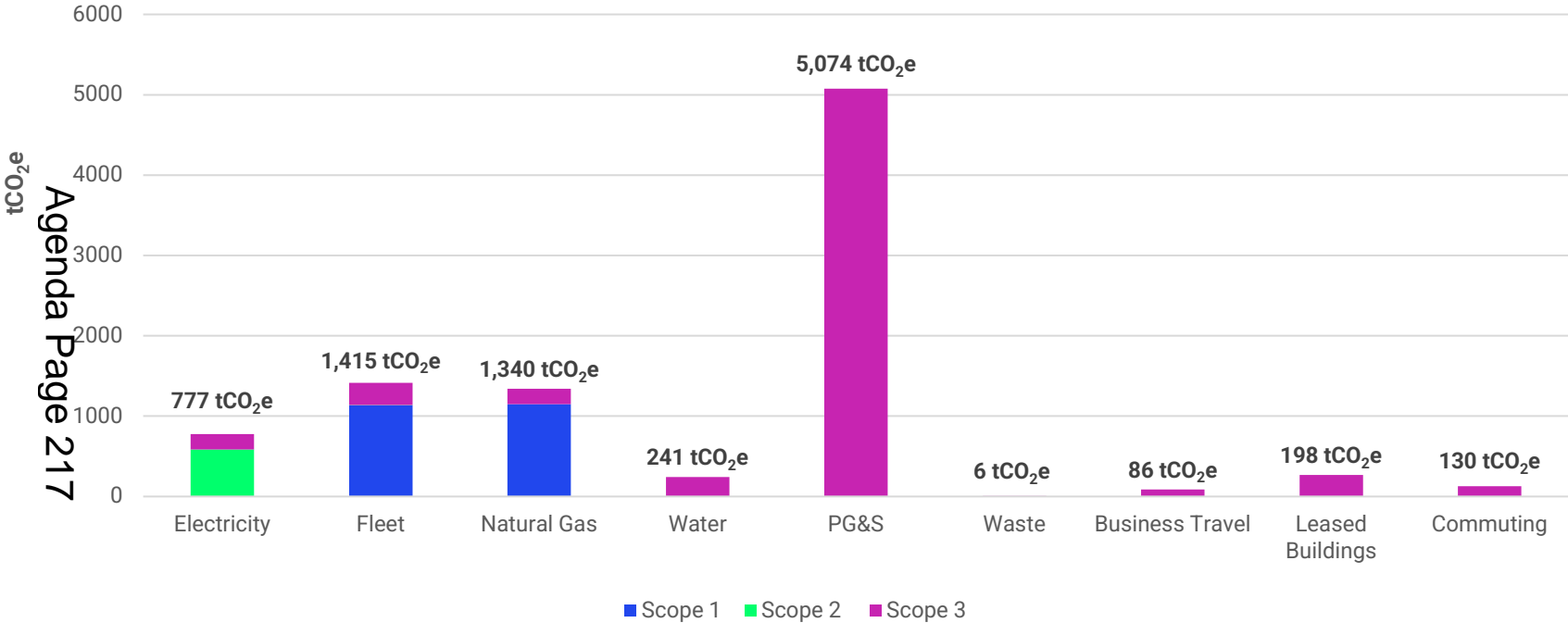
Comparison of organisational emissions (Scope 1 and 2)



Emissions by source



Emissions by source, inc. upstream contributions



Housing decarbonisation

NSDC's housing portfolio of 5,603 houses is not currently included within the existing 2035 target. We have explored options for inclusion into the existing 2035 target or inclusion into an alternate 2050 target for **housing only**.

Baseline:

- Baseline emissions (2023/24), **19,921 tCO₂e**, with 75% of emissions from heating.
- Of the total emissions, **17,315 tCO₂e** are attributed to direct emissions (i.e. excluding those from WTT)
- 97% of houses rely on burning fossil fuels (gas, oil, LPG), the remainder use electricity (resistance/heat pumps) or wood burners.

Carbon Reduction Pathways (more detail overleaf)

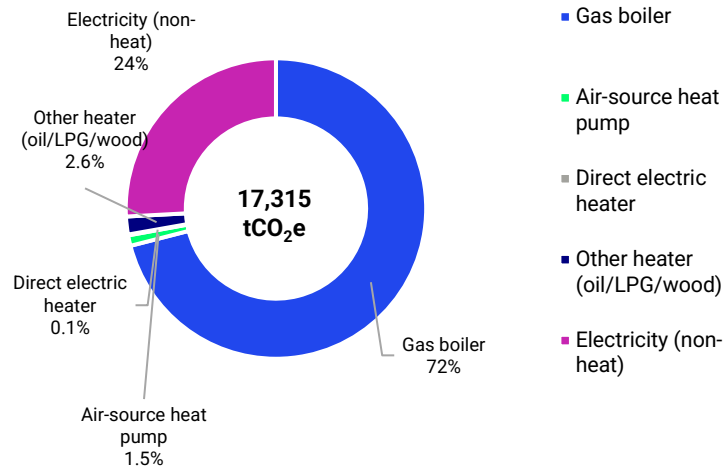
- Low retrofit scenario –improve energy efficiency for poorly rated housing (EPC D-G), with full electrification of all buildings.
- High retrofit scenario - extensive energy efficiency improvements (whole house deep retrofit, solid wall insulation) with full electrification

Decarbonisation targets:

- 2035 target: retrofit ~560 houses/year, ~£8m - £15m CAPEX per annum.
- 2050 target: retrofit ~220 houses/year, ~£3m - £6m CAPEX per annum.

NB. Significant offsets required in all scenarios to achieve carbon neutrality due to residual emissions present in the electricity grid.

Total housing direct emissions by source of energy consumption



Comparison with 2019

Existing target



NSDC's
2035
carbon
neutral
target

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Emission source	2019 emissions (tCO ₂ e)	2024 emissions (tCO ₂ e)
Electricity	715*	777 (+9%)
Fleet	1,058*	1,415 (+34%)
Natural gas	715*	1,340 (+87%)
Water	10	241 (n/a)
Waste	11	6 (-39%)
Total:	2,510	3,779 (+51%)
Other sources:		
Housing	15,645 (direct emissions only)	17,315 (direct emissions only) 19,921 (including WTT)
Purchased goods and services	280	5,074
Business travel	49	86
Leased buildings	408	198
Commuting	108	130

* Updated to include Scope 3 emission sources, [further explanation is provided here](#).

Comparison with 2019

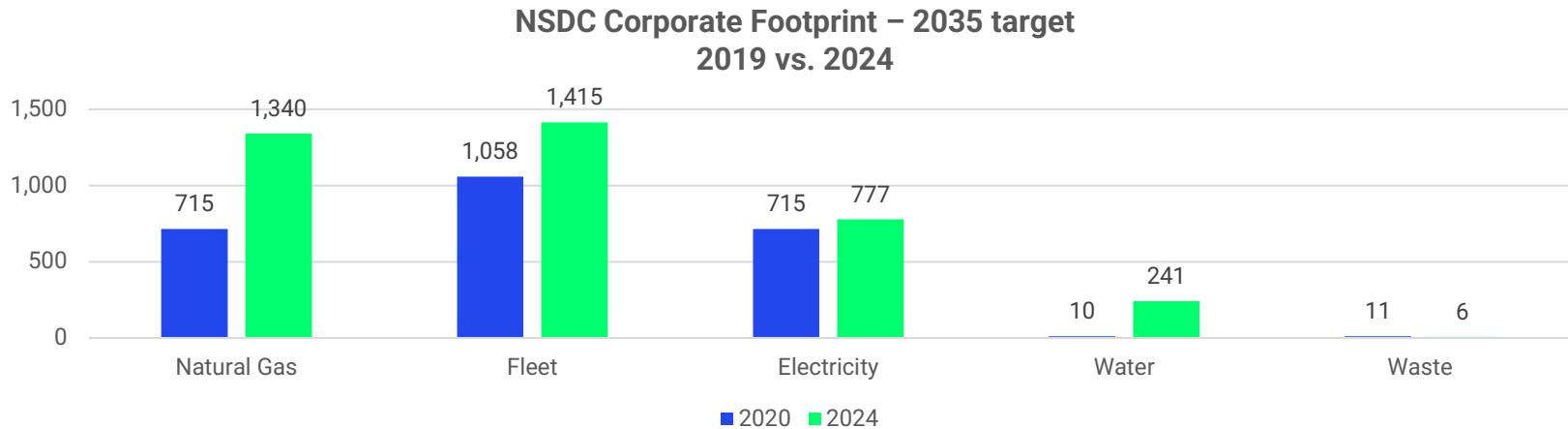
Existing target

Emissions from natural gas, fleet operations, and electricity have increased. While some progress has been made in reducing fleet and natural gas emissions, significant efforts are still needed. Achieving full electrification by 2035 is essential to meet the carbon neutrality target.

The rise in emissions between 2019 and 2024 is primarily driven by:

- 1. An increase in the number of buildings under NSDC’s control
- 2. Expansion of NSDC’s operations and workforce (FTE rising from 493 in 2019 to 587 in 2024)
- 3. Enhancements in accuracy and novel calculation methodology, particularly for PG&S

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Housing scenarios



- Energy use and emissions reductions were calculated for NSDC's housing.
- Carbon savings and associated costs for each of the decarbonisation interventions are calculated based on two retrofit options, targeting either 2035 or 2050.
 - High retrofit: All houses have energy efficiency measures and heat electrified.
 - Light retrofit: Some houses (EPC C-G) have energy efficiency measures, and all housing have heat decarbonised

ID	Scenario Explanation	2030 emissions remaining (tCO ₂ e)	2035 emissions remaining (tCO ₂ e)	2050 emissions remaining (tCO ₂ e)	Cumulative emissions to 2050 (tCO ₂ e)
H1	High retrofit: All houses have extensive energy efficiency measures and heat decarbonised by 2035	11,847	1,543	376	147,348
H2	High retrofit: All houses have extensive energy efficiency measures and heat decarbonised by 2050	13,970	9,818	376	238,287
H3	Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2035	11,933	1,624	395	148,620
H4	Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2050	13,928	9,788	395	238,562

Housing costs



The estimated capital expenditure (CAPEX) varies significantly across scenarios, as illustrated in the table.

High retrofit scenarios incur considerably higher costs, ranging from £139m to £145m, with annual estimates of £14.5m for the 2035 target and £5.6m for the 2050 target.

In contrast, the light retrofit scenario requires £76m across both target years, with annual costs estimated at £7.6m for 2035 and £3m for 2050.

This analysis indicates that the speed of retrofitting properties, whether faster or slower, has minimal impact on the overall CAPEX required. Instead, the primary constraints in decarbonisation are expected to be staff resourcing, annual capital allowances, and supply chain capacity.

Notes:

- Inflation has not been considered in the costings, figures presented in the table represent 2024 prices.
- Running costs, such as OPEX and general maintenance, are not included in the costings.
- Decreases and/or increases in natural gas and electricity bills as a result of the interventions are not included in the costings.

Scenario	Est. total CAPEX	Est. CAPEX (per year)
H1: High retrofit 2035	£145m	£14.5m
H2: High retrofit 2050	£139m	£5.6m
H3: Light retrofit 2035	£76m	£7.6m
H4: Light retrofit 2050	£76m	£3m

NSDC Corporate overview



- In 2024, *Be Design* audited the majority of NSDC's corporate buildings, responsible for most of the natural gas, electricity, waste and water-related emissions. These energy audits provided the basis of the corporate estate emissions target feasibility appraisal. This included forecasts for emissions arising from **natural gas** and **electricity** usage for 13 of NSDC's buildings.
- The target feasibility appraisal aims to provide NSDC with an understanding of realistic pathways to reaching Net Zero for its corporate buildings, considering both the type of interventions and phasing. **Four different scenarios** are modelled to gauge the ambition and deployment rate of interventions highlighted in the audits, and we present the cost and carbon implications for each of these 4 scenarios (see outline below).
- The baseline emissions associated with these modelled energy values were calculated by Carbon Trust using 2022 emissions factors and totalled **1,572 tCO₂e**, which equates to **17% of the total footprint** (not including NSDC homes). Of these emissions, **825 tCO₂e** are attributed to natural gas consumption, with electricity making up the remaining **747 tCO₂e**.

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	Scenario Explanation	Baseline Emissions	Residual emissions by 2030 (tCO ₂ e)	Residual emissions by 2035 (tCO ₂ e)	Capital Investment (£) ¹
	Deep retrofit (all interventions) implemented by 2030	1,572	389	126	£3,882,000
	Deep retrofit (all interventions) implemented by 2035		791	126	£3,882,000
	Light retrofit (LED lights and heat decarbonisation ²) implemented by 2030		524	170	£2,209,000
C4	Light retrofit (LED lights and heat decarbonisation ²) implemented by 2035		865	170	£2,209,000

1 - Capital investment is presented in 2024 real terms and has not been adjusted for inflation

2 - Refers to natural gas boiler(s) being replaced by ASHP, GSHP or electric heating

Overview of targets



NSDC have an existing 2035 Carbon Neutrality target covering corporate (buildings), waste and water, and fleet. We have explored the feasibility of three potential targets based on the scenarios developed for NSDC Corporate (C1-4) and Housing (H1-4), compared with this existing 2035 target.

An overview of the targets is provided below, outlining how they would differ from NSDC’s existing target.

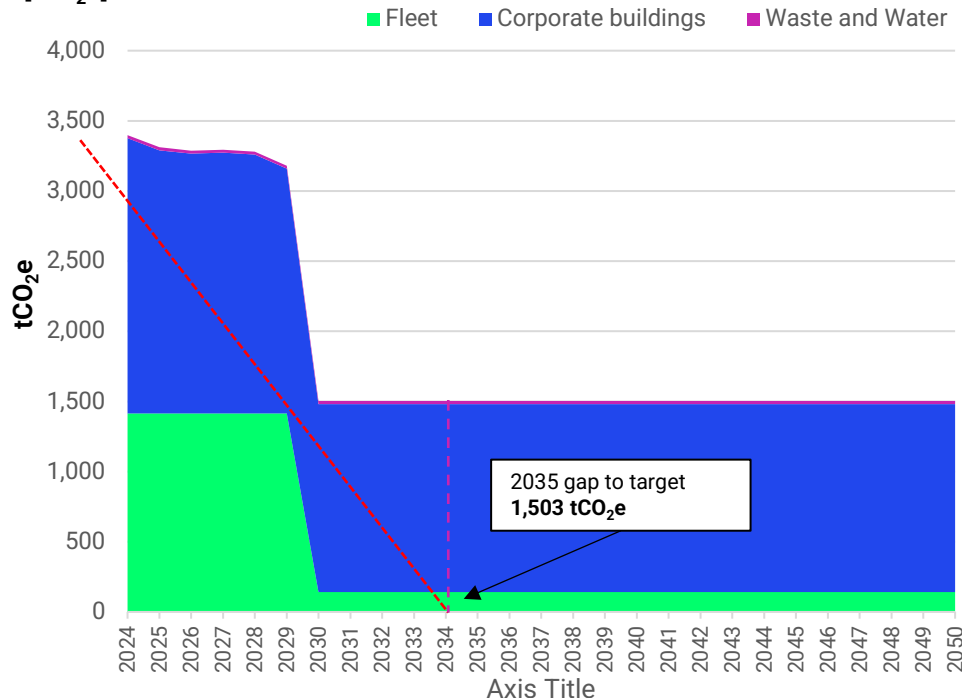
Potential target	Changes to the existing 2035 target
2030 target: moving existing target forwards to 2030	Moving the existing target forwards by 5 years to 2030, keeping the emission sources the same.
2035 target: integrate housing with the existing 2035 target.	Integrate housing with the existing 2035 target.
2050 housing target: a separate housing-specific target aims to achieve carbon neutrality by 2050, in addition to NSDC’s existing 2035 target.	In addition to retaining the existing 2035 target, this would involve creating a separate 2050 target for the decarbonisation of housing only.

Business as usual

In this business-as-usual scenario, the existing 2035 target is established, incorporating initiatives already considered by NSDC, such as HVO for fleet (90% emissions reduction) and a green tariff for electricity by 2030.

- Other initiatives, like tree planting and solar PV, are acknowledged but not included in the pathway due to uncertainties about their impact.
- Achieving carbon neutrality under this plan will require carbon offsets of 1,503 tCO₂e in 2035. (£30k - £75k per annum)
 Tree-planting schemes are expected to sequester 338 – 1,351 tCO₂e per annum.
- This pathway continues to use natural gas to 2050 and is heavily reliant on biofuels. While HVO is stated to reduce emissions by 90%, this does not account for significant indirect land-use changes, biodiversity loss, or the full lifecycle footprint of biofuel production.
[Further details on our recommended positioning on HVO available here.](#)
- Given these challenges, there is a need to explore more sustainable long-term solutions, such as electrification for heating and transport.

Business as usual
 (sustainable electricity tariff, grid decarbonisation and HVO)¹
 [tCO₂e]



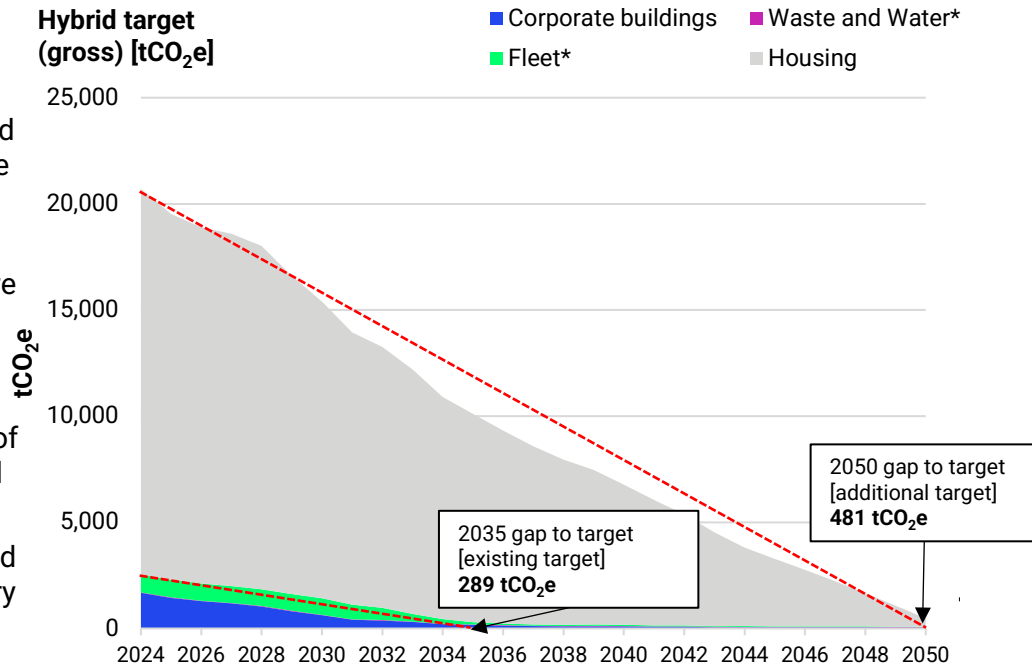
¹There are variations in the emissions reported from fleet and corporate emissions as the methodology varies from other pathways explored in this report.

Example scenario: 2050 target

Under this proposed target, a hybrid approach is proposed. In this scenario, two emission targets would be created, the existing 2035 target and a separate housing-specific target aiming to achieve Net Zero by 2050.

- By 2035, emissions are projected to decrease by 51%, and by 2050, the reduction is expected to reach 98%, inclusive of residual emissions from electricity generation.
- Achieving carbon neutrality under this plan will require carbon offsets: 289 tCO₂e in 2035 (offsets for housing are not yet needed) and 481 tCO₂e in 2050 after the housing target is met (£10k - £25k per annum).
- The analysis estimates that decarbonising corporate buildings and housing in this scenario will require £78m of capital expenditure, with additional costs expected for all buildings, waste and water, and fleet.
- This target still involves significant capital investment and additional staffing to support a large-scale capital delivery program for corporate buildings and housing.
- Compared to other targets, this plan is considered the most achievable within the existing NSDC capacity for delivering retrofits.

Hybrid target (gross) [tCO₂e]



Corporate emissions pathway modelled using C4, light retrofit (LED lights and heat decarbonisation) implemented by 2035. Housing emissions modelled using H4, Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2050.

*Emission projections for these emission sources have been carried across from the existing study as they weren't included in this study. All emissions intensity factors (e.g. gCO₂e/kWh) have been updated to reflect the most recent projections.

Recommended approach

Based on our analysis, we recommend that NSDC retain its existing 2035 target while introducing a new 2050 target for housing, as this is likely to be the most feasible pathway to achieving full decarbonisation.

Potential target	Scope	Emissions reduction by 2030	Emissions reduction by 2040	Total emissions (to 2050)	Estimated CAPEX (excludes fleet, water and waste)
Business as usual: 2035 target with green electricity tariff and HVO	<ul style="list-style-type: none"> Corporate buildings Water and waste Fleet 	-56%	-56%	51,302 tCO₂e	n/a
2030 target: 2030 target: moving NSDC's existing target to 2030	<ul style="list-style-type: none"> Corporate buildings (C3) – light retrofit by 2030 Water and waste Fleet 	-63%	-91%	17,700 tCO₂e	£2.2m (corporate only)
2035 target: integrate housing with the existing 2035 target.	<ul style="list-style-type: none"> Corporate buildings (C4) – light retrofit by 2035 Housing (C3) – light retrofit by 2035 Water and waste Fleet 	-36%	-95%	168,855 tCO₂e	£78m (corporate and housing only)
2050 housing target: a separate housing-specific target aims to achieve carbon neutrality by 2050, in addition to NSDC's existing 2035 target.	2035 target (existing) <ul style="list-style-type: none"> Corporate buildings (C4) – light retrofit by 2035 Water and waste Fleet 2050 housing target <ul style="list-style-type: none"> Housing (H4) – light retrofit by 2050 	-25%	-67%	259,522 tCO₂e	£78m (corporate and housing only)

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3.	NSDC Corporate decarbonisation	<u>45</u>
4.	Housing decarbonisation	<u>60</u>
5.	Target review	<u>72</u>
6.	Next steps	<u>81</u>
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Target Review

1. Background

Introduction



Background

NSDC worked with Carbon Trust in 2019 to establish a climate emergency action plan which included the development of an emissions baseline, a 2035 carbon neutrality target and a pipeline of carbon reduction interventions. The work also included an assessment of the emissions associated with NSDC Homes, and a high-level review of the potential retrofit strategies/costs that would be required to achieve carbon neutrality of housing emissions under various pathways (e.g., 2030, 2035, 2040). The decision was taken not to include NSDC Homes in the target given the relative scale of emissions (c.30% of total measured emissions) and associated costs and challenges involved.

Since 2019, a number of carbon reduction measures have been progressed towards implementation such as Solar PV installations and EV charging infrastructure at NSDC corporate and leisure buildings. Additionally, NSDC's portfolio of assets has changed, most significantly with the integration of Southwell leisure centre, now under direct council control (meaning an overall increase in council emissions).

This project

New political **leadership at the council wishes to revisit the previous target commitments** to understand the feasibility of increasing ambition in relation to the **boundary of emissions and/or target dates**. NSDC are now looking to re-commission Carbon Trust to support with the following objectives:

1. Conduct **analysis to understand the feasibility of bringing the 2035 target forward to 2030** (with the existing boundary of emissions: gas, electricity, water, waste, fleet).
2. Conduct analysis to understand the feasibility of integrating the **housing stock (NSDC Homes emissions) into the existing 2035 target**. *Following discussions with the housing team, a target date of 2050 was also explored.*

Workflow

Phase 1:

KO, Mobilisation
& Carbon
Footprint



Project kick-off

Mobilisation, data &
info collection

Carbon footprint
assessment

Carbon footprint
briefing

Phase 2:

Emissions
Reduction
Feasibility



Housing portfolio
emissions reduction
feasibility

NSDC corporate
portfolio emissions
reduction feasibility

Phase 3:

Emissions
Target
Feasibility
Appraisal

Model targets and
interventions
pathways

Develop target
options appraisal
report

Summary
presentation
and close-out

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Report Overview



This report details a variety of data and actions towards achieving net zero, please find further details on each section below.

Carbon footprint overview (2023/24)

- Analysis and calculation of NSDC's carbon footprint for the 2023/24 period
- Analysis of progress towards the existing 2035 target.
- Recommendations to improve accuracy of reporting

NSDC Corporate decarbonisation

- Feasibility of decarbonising buildings owned and operated by NSDC, exploring potential phasing, costs and strategies
- Explores the feasibility of 2030 and 2035 target, building on existing work completed by BE DESIGN.

Housing decarbonisation

- Focuses on decarbonising houses owned by NSDC, exploring potential phasing, costs and strategies
- Explores the feasibility of achieving a 2035 and 2050 target.

Target review

- Explores the feasibility of achieving different target dates (2030, 2035 and 2050) across different scenarios.

Next steps

- Summarises next steps and recommendations required to progress towards decarbonisation.

Target Review

2. Carbon footprint overview (23/24)

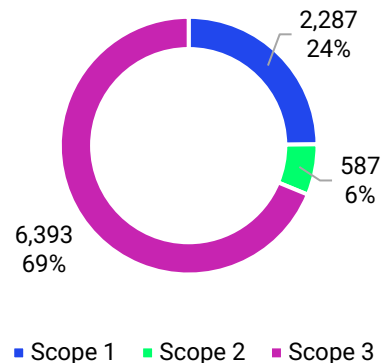
Overview

This section explores NSDC's emissions from 2023/24 (FY), with each source of emissions broken down by category and analysed. It provides insights into the key contributors to the carbon footprint, highlighting trends and potential areas for reduction.

- Total NSDC emissions for the 2023/24 baseline year total **9,267 tCO₂e**
- Scope 1 emissions, which arise from natural gas and diesel combustion in NSDC's buildings and fleet, total **2,287 tCO₂e**.
- Scope 2 electricity usage is responsible for **587 tCO₂e**, coming almost entirely from buildings.
- The largest contribution to NSDC's footprint is from Scope 3 emission sources, totalling **6,393 tCO₂e**. This includes emissions from the treatment of waste and wastewater, water usage, business travel, commuting and purchased goods & services (PG&S).
- Of the scope 1 and 2 emissions, upstream emissions associated with the extraction, refinement and distribution of fuels and electricity, classified as "upstream energy related activities" contribute **658 tCO₂e**. These emissions also fall under Scope 3.

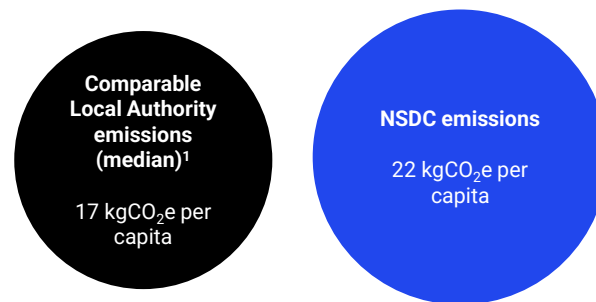
¹ Average LA emissions relate to the median Scope 1 and 2 emissions across all comparable CIPFA Neighbours Local Authorities, where data was publicly available. The emissions boundary and completeness of emissions reported are expected to vary considerably across each Local Authority.

Total NSDC emissions by source, 2023/24*



* Rounding errors lead to percentages not totalling 100%

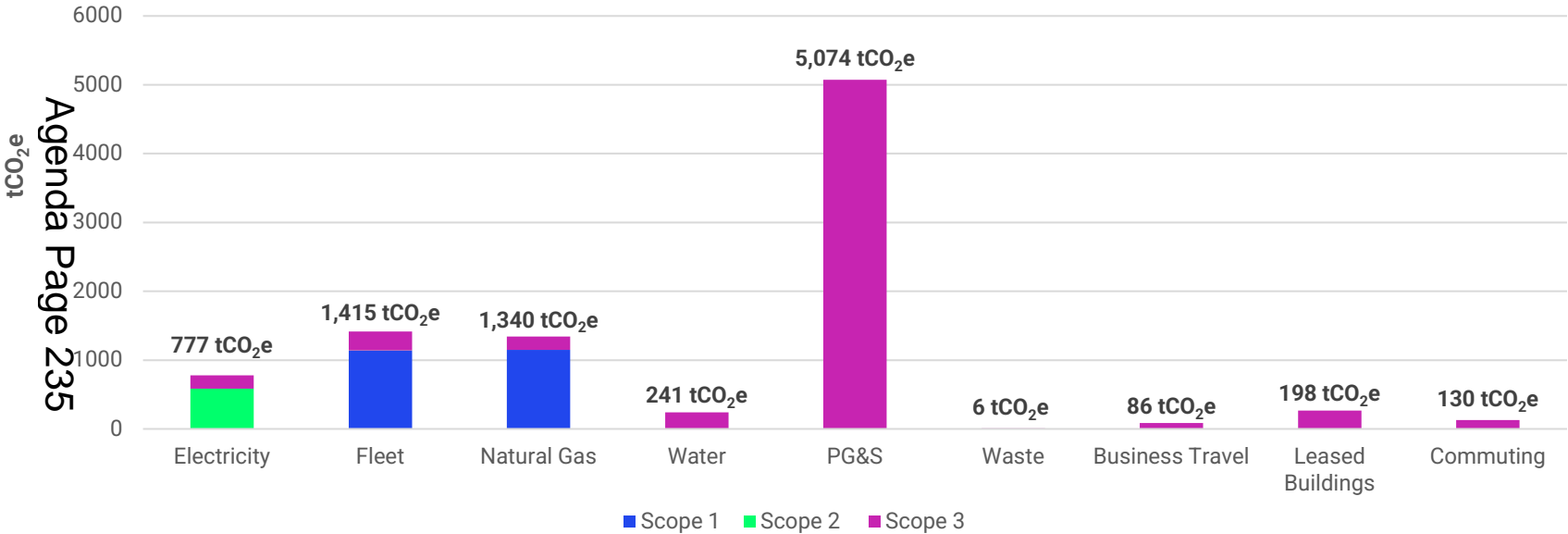
Comparison of organisational emissions
(Scope 1 and 2)



Emissions by source

The chart below shows all emission sources calculated as part of NSDC’s 2023/24 footprint, overleaf details which of these emission sources are currently included within NSDC’s 2035 carbon neutrality target. Comparisons for all emission sources with 2018/19 are [available here](#).

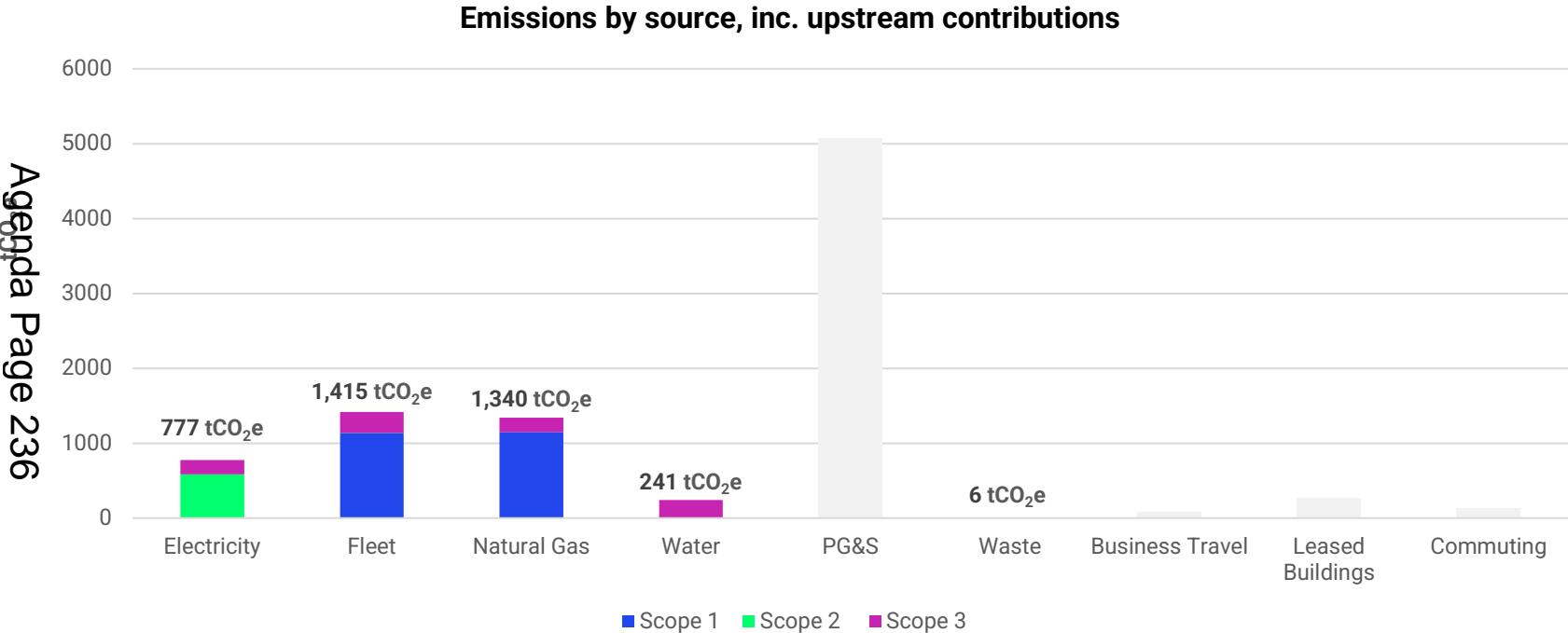
Emissions by source, inc. upstream contributions



Emissions by source

2035 target sources

The chart below shows all emission sources that are included within NSDC’s 2035 carbon neutrality target. The emissions from these emission sources total **3,779 tCO₂e**.

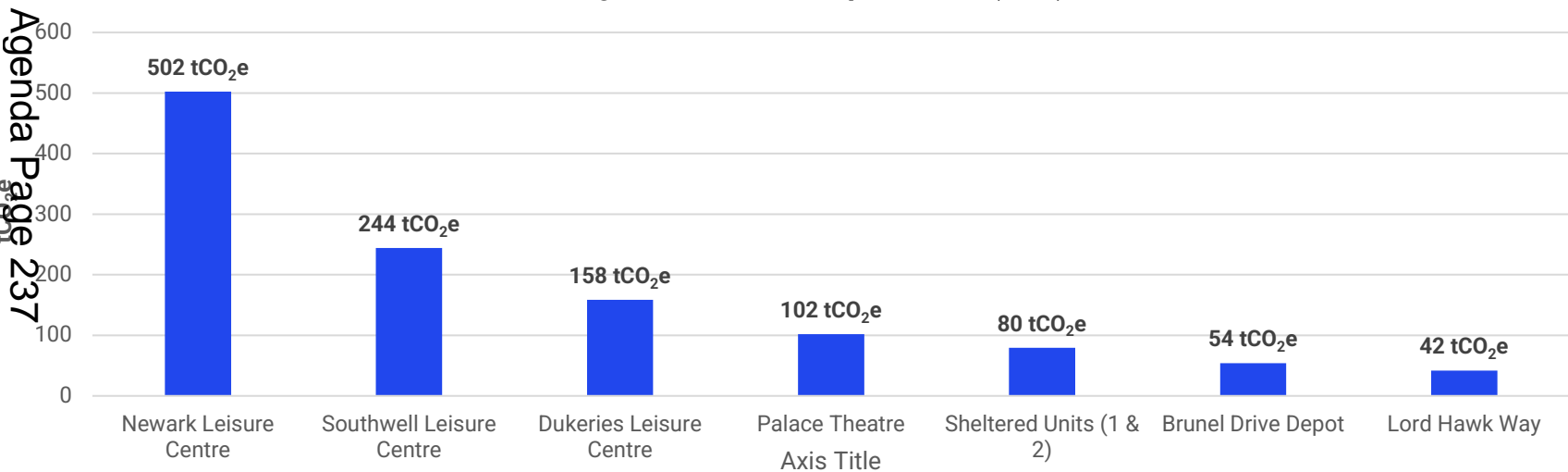


Stationary emissions

Natural gas 23/24

- Natural Gas emissions, which arise from the heating of NSDC buildings, total **1,340 tCO₂e**.
- The 7 highest-emitting sites are presented on this page, which make up ~90% of all natural gas emissions.
- Newark Leisure Centre makes over a third of all the emissions (33%), **502 tCO₂e**. Together with Southwell Leisure Centre (**244 tCO₂e**) and Dukeries Leisure Centre (**158 tCO₂e**), these 3 sites alone make up 67% of NSDC natural gas emissions.
- Leisure Centres typically have high heating demands, especially in instances where a heated swimming pool is present.

Natural gas emissions – top emitters (90%)

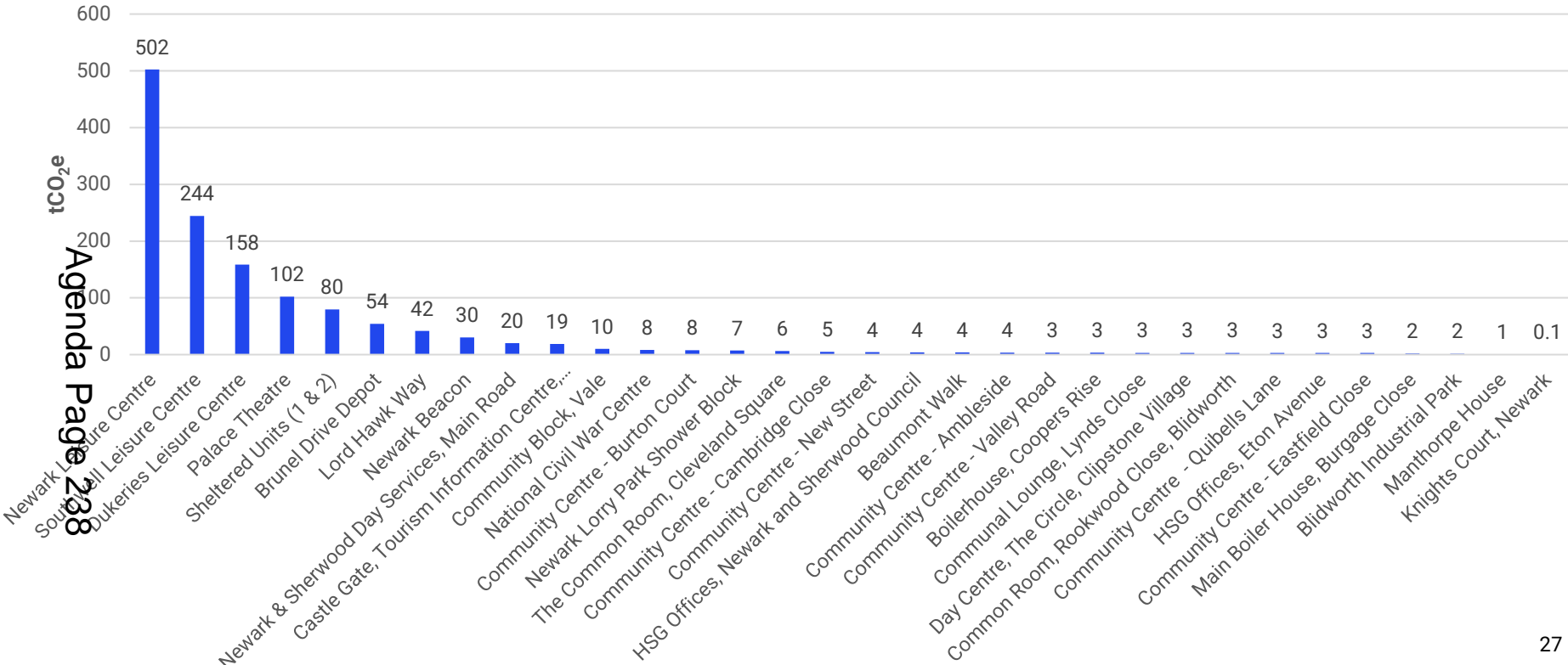


Stationary emissions

Natural gas by site 23/24



Natural gas emissions (all sites)



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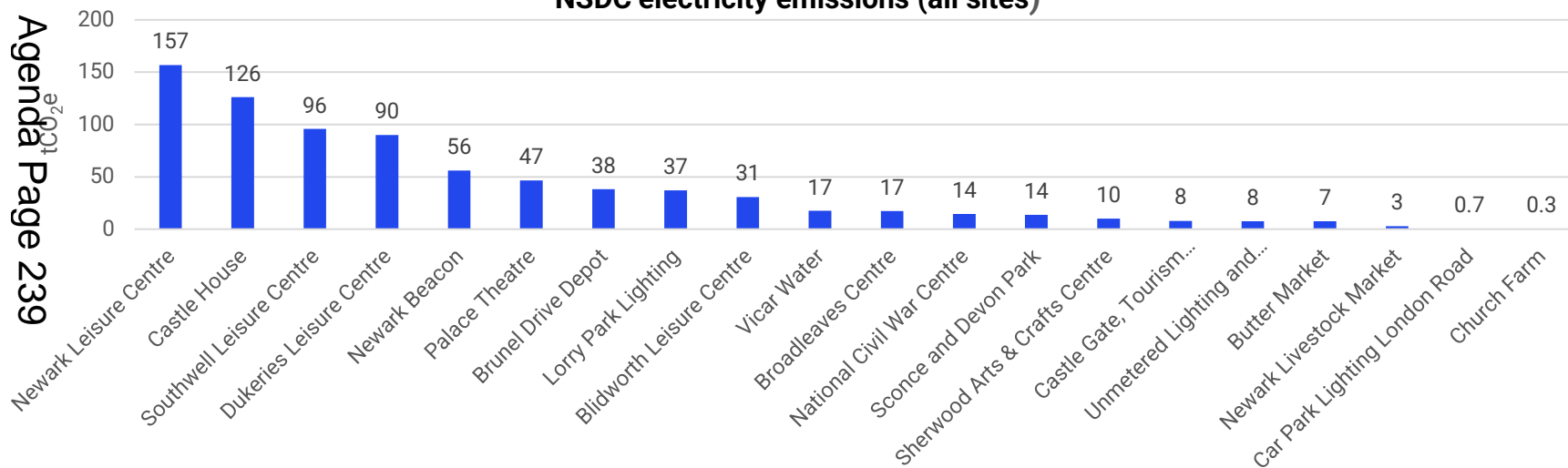
Stationary emissions

Electricity 23/24



- Electricity emissions total **777 tCO₂e**.
- Less than half of the sites (40%) make up 75% of all electricity-related emissions.
- Castle House, NSDC's headquarters, is the second largest contributor to corporate electricity emissions.
- Similar to the natural gas emissions, leisure centres are identified as some of the most energy-intensive sites in NSDC's corporate portfolio. Newark Leisure Centre, Southwell Leisure Centre and Dukeries Leisure Centre are the first, third and fourth highest-emitting sites, respectively.

NSDC electricity emissions (all sites)

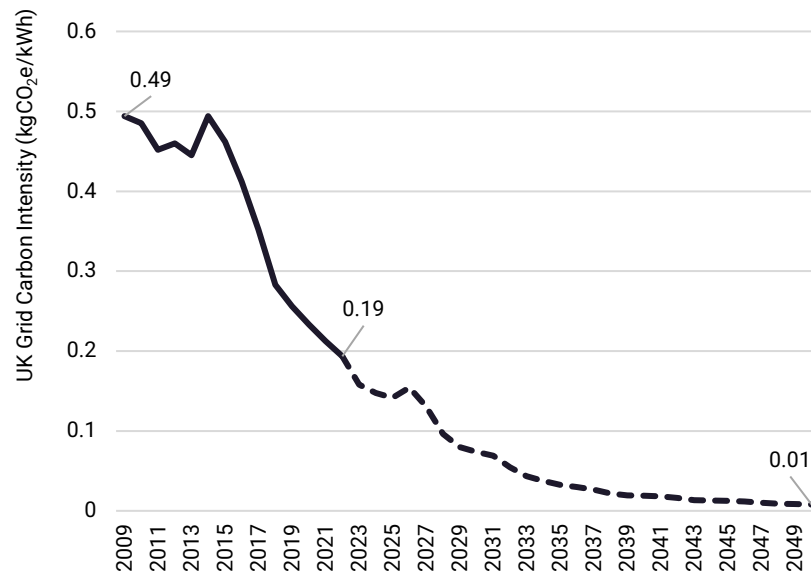


Stationary emissions

Electricity – grid decarbonisation

- The UK power sector has undergone significant changes in the last 10 years: coal power stations have been increasingly phased out and replaced by renewable electricity generation sources such as solar and offshore wind. Between January and May 2019, Britain generated more power from clean energy than from fossil fuels for the first time since the Industrial Revolution.
- In 2010 consuming 1 kWh of electricity would result in 0.49 kgCO₂e being emitted, by 2021 this value had more than halved.
- The UK plans to have 100% of electricity generated to be renewable by 2030.
- By 2030, it is expected the emission factor for UK electricity will approach 0.1 kgCO₂e per kWh; and almost zero by 2050.
- The 'greening of the grid' means that NSDC's footprint will naturally shrink over time. **The more NSDC moves to electrify its heating systems and transport, the more its footprint will decrease over time.**

Example projection of UK electricity grid carbon intensity

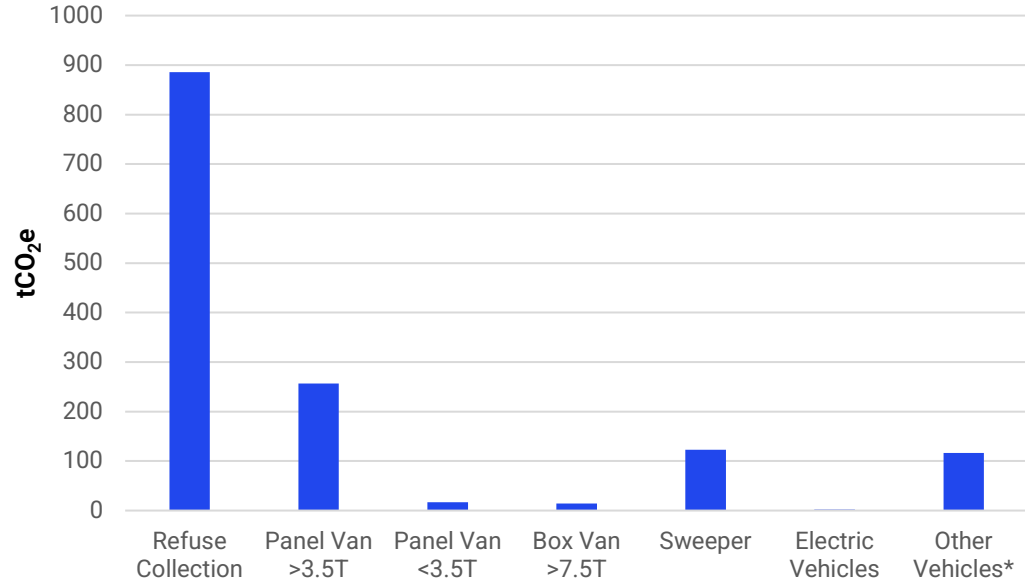


Transport

Fleet 23/24

- Fleet is one of the biggest contributors to NSDC's total footprint.
- Emissions from NSDC's fleet comprised of 100 vehicles is equal to **1,414 tCO₂e**.
- Of these emissions, there is an overwhelming contribution from **diesel consumption** (~99.9%).
- Diesel vehicles offer a better fuel efficiency compared to petrol vehicles, and therefore fewer carbon emissions on a km driven basis; however, they also produce more particulate matter, SO_x and NO_x which greatly contribute to poorer air quality.
- The largest contribution to fleet emissions can be attributed to the Dennis Eagle Refuse vehicles, which are responsible for ~63% of the total fleet emissions (**886 tCO₂e**).

NSDC fleet emissions, by vehicle category



*Includes the following categorisations: Single Cab, Double Cab, 4x4 Vehicle, Rigid, Compact Tractor, Workshops

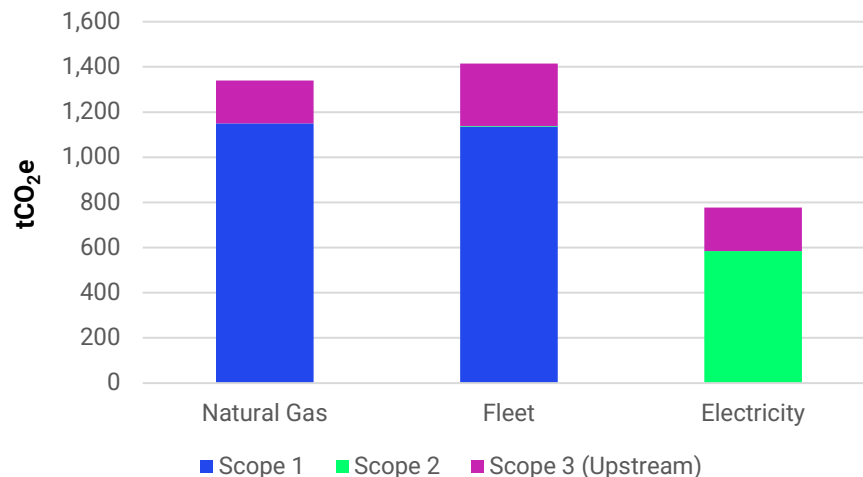
Upstream energy related activities

- The use of fossil-fuel based energy produces emissions associated with the production of that fossil-fuel energy and its distribution to the point of use. This is why certain **Scope 1 and Scope 2 emissions sources also have a Scope 3 contribution to their emissions**. These emissions are classed under 'upstream energy related activities' and typically fall into two categories: Well-to-tank (**WTT**) emissions and Transmission & distribution (**T&D**) emissions.
- WTT captures the emissions produced during the extraction, refining and transportation of the raw fuel sources to an organisation's site (or asset)**, prior to combustion. These emissions therefore relate to the natural gas consumed for heating; the fuels used in fleet vehicles and the gas and coal used in power stations when producing electricity.
- T&D applies only to electricity consumption and includes the emissions associated with the energy loss that occurs in getting the electricity from the power plant to the organisations that purchase it.** A subset of this is the additional WTT emissions associated with the energy loss in the electricity grid – WTT & T&D.

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	Natural Gas	Fleet	Electricity
Scope 1	1,150	1,136	0
Scope 2	0	1.7	585
Scope 3 (Upstream)	190	277	192
Upstream emissions contribution to total footprint	14%	20%	25%

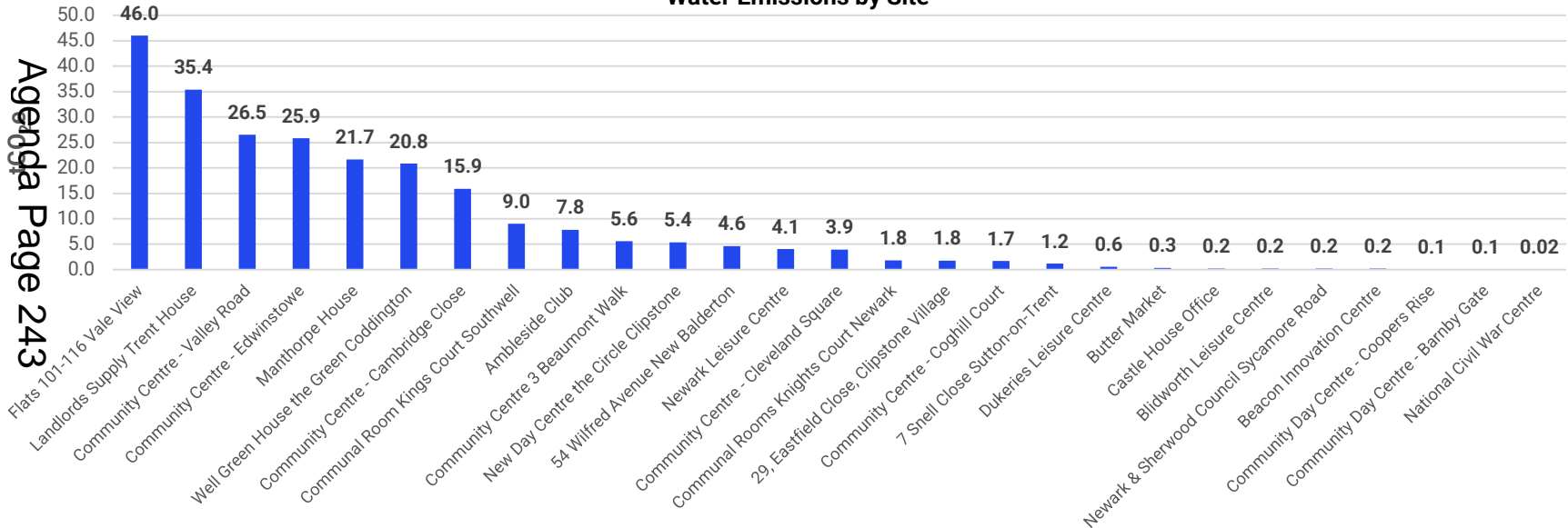
Upstream energy related activities from Scope 1 and 2 emission sources



Water

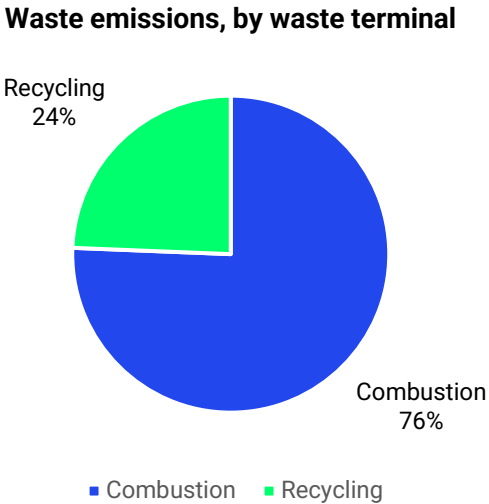
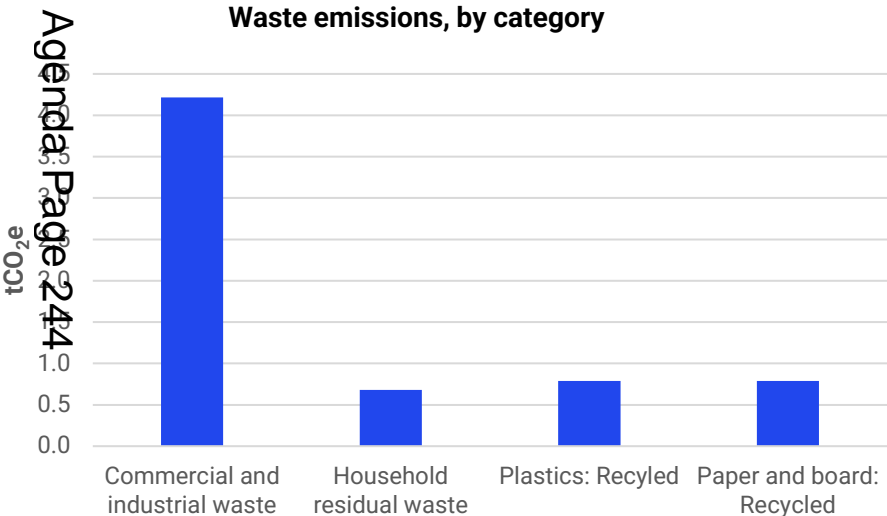
- Water emissions total **241 tCO₂e**, these stem from a combination of upstream supply and downstream processing
- Unlike gas and electricity, the sites with the highest emissions are residential areas, rather than commercial spaces like leisure centres.
- The site with the highest emissions from water and wastewater treatment are **Flats 101-116 Vale View**. Community centres also make significant contributions.
- 7 sites emit 80% of the total water emissions, equivalent to **192 tCO₂e**.

Water Emissions by Site



Waste

- Waste emissions include those resulting from the downstream processing of waste generated by NSDC. These emissions only apply to waste generated from the Council. Emissions from waste management and treatment services for Housing will be captured in the PG&S footprint.
- In total, NSDC’s waste contribution is low, with emissions totalling **6.5 tCO₂e**, less than 0.1% of the total footprint.
- Data on waste terminals was provided, but NSDC did not provide any information on waste types. It was assumed that any waste originating from residential housing was classed as “household residual waste”, and any waste from leisure centres, offices or other commercial buildings was classed as “commercial and industrial waste”. It was also assumed that the recycled waste was a 50:50 split between paper and board, and plastics.



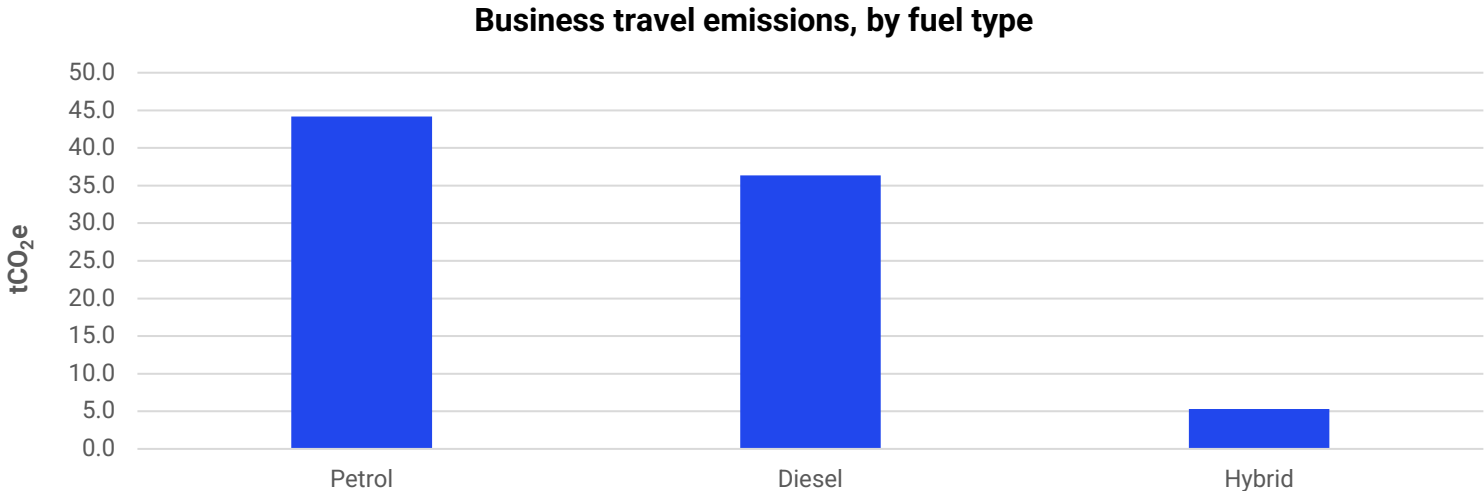
Transport



Commuting and business travel 23/24

- Commuting emissions are substantial, responsible for **130 tCO₂e**. No information on journey type, journey distance, or vehicle type was provided. Emissions were estimated using 2019 baseline figures and the latest FTE count (proxy approach).
- Business travel makes a minimal contribution to NSDC’s total footprint, amounting to **86 tCO₂e**.
- All of the emissions associated with business travel arise from cars, with the largest contribution being petrol (51%), followed by diesel (42%).
- There are known minor contributions from rail travel and taxis, but these were not accounted for due to insufficient data.

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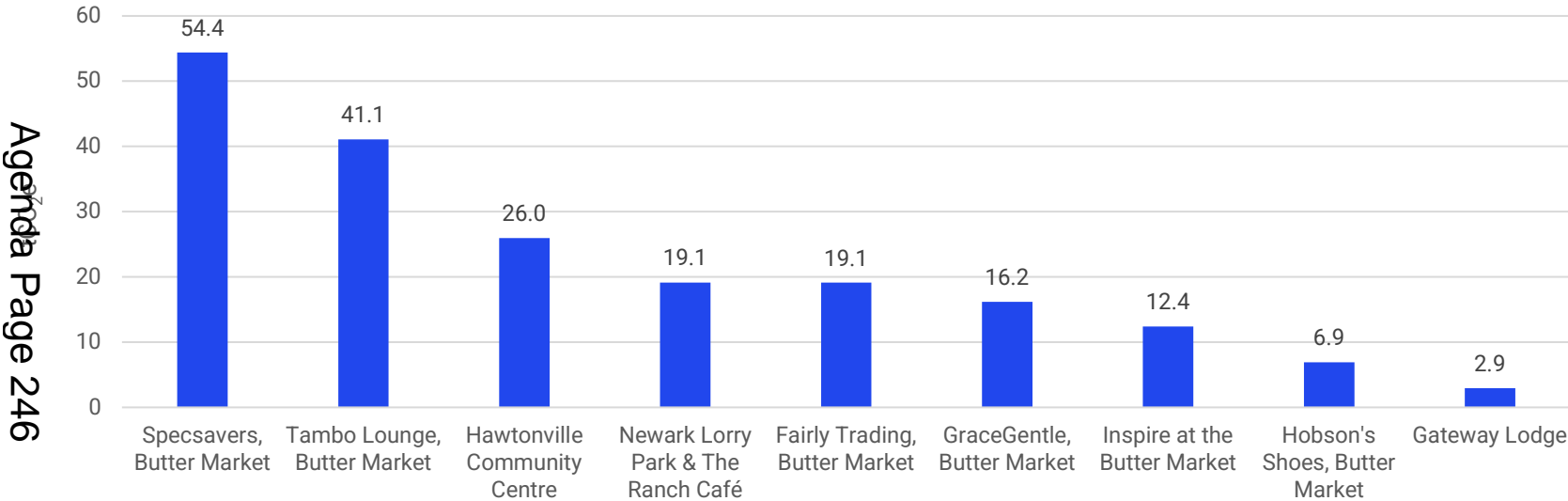


Leased assets



- Leased buildings make a small contribution to NSDC’s total footprint, amounting to an estimated **198 tCO₂e**.

Emissions from Leased Buildings



Purchased goods and services

By supplier



- Purchased goods and services are the largest contributor to NSDC's footprint, totalling **5,074 tCO₂e**, representing **58% of the total footprint**.
- Spend data used as a proxy was provided for just under 30,000 supplier invoices. Using the *Level 9 Account Name*, this spend data was matched to SIC codes to estimate emission contributions.
- In total, contracts were divided into 15 broad categories and 45 sub-categories. A full breakdown of all 15 emission source categories is on the next page.

In the future, supplier-specific data for purchased goods and services should be used wherever possible to calculate associated emissions, instead of using expenditure proxies.

- Despite this being an indirect source of emissions, NSDC will have some influence over third-party product and service-based emissions. This can be usually be achieved through active supplier engagement and selection.

Of the 5 highest-emitting contract types, the top 4 all represent services, rather than physical goods. The highest contributions to PG&S emissions relate to water supply & treatment, and waste remediation services.

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The top 5 categories of spend by highest emissions are:

Water supply, sewerage, waste management - Remediation services and other waste management services: **853 tCO₂e**

Water supply, sewerage, waste management - Waste collection, treatment and disposal services; materials recovery services: **524 tCO₂e**

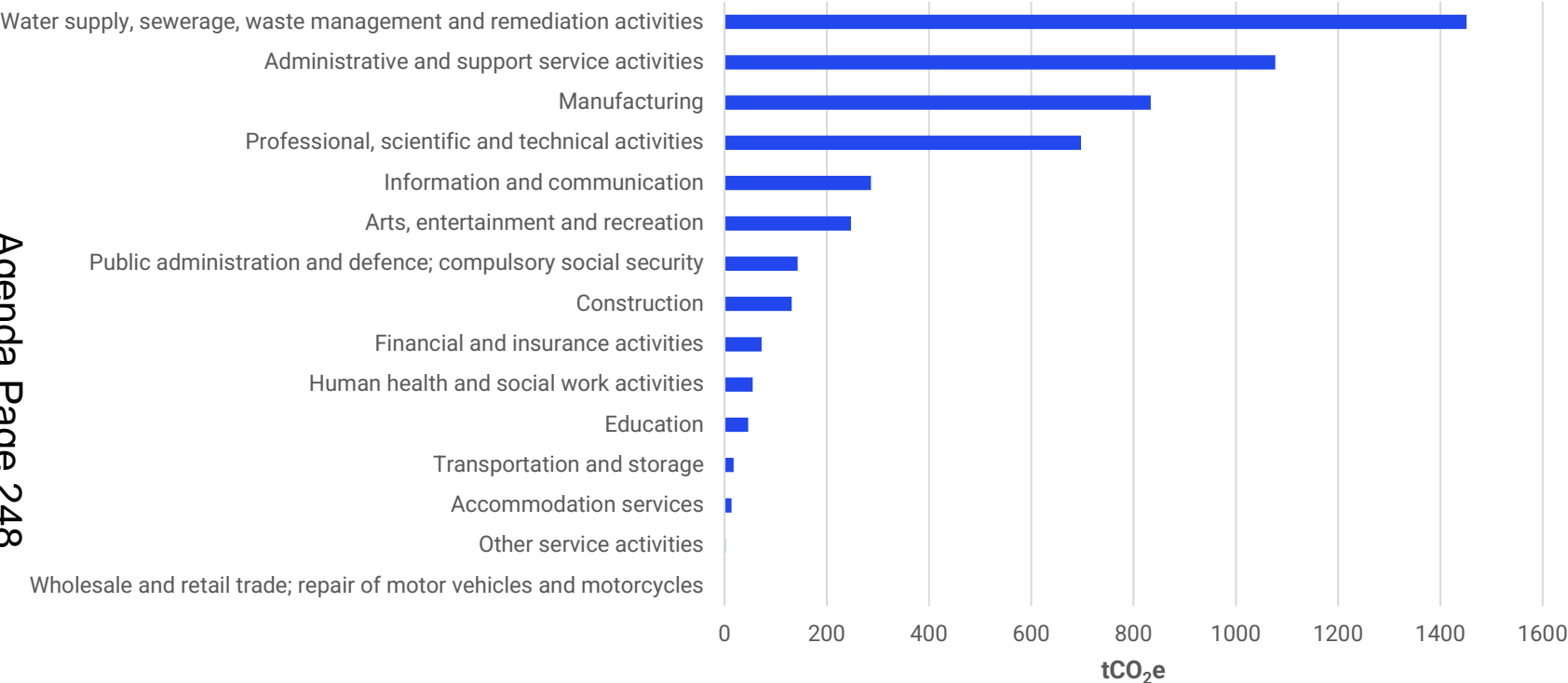
- Administrative and support service activities – Services to buildings and landscape: **421 tCO₂e**
- Professional, scientific and technical activities – Other professional, scientific and technical activities **329 tCO₂e**
- Manufacturing – Machinery and equipment n.e.c: **223 tCO₂e**

Purchased goods and services

By category



PG&S Emissions by SIC category



Housing

Summary of emissions 23/24

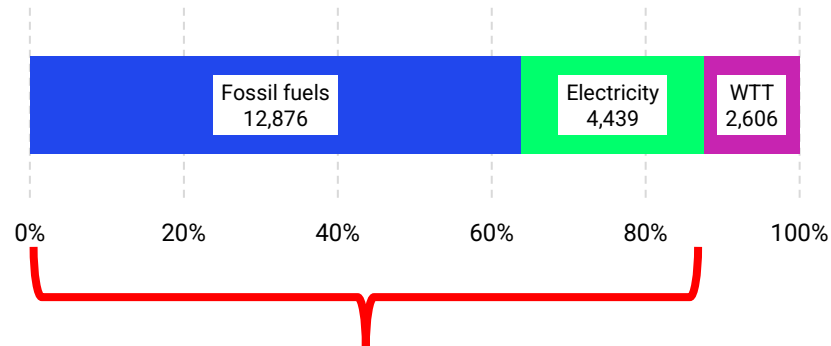
- Emissions associated with housing total **19,921 tCO₂e**, direct emissions (i.e. excluding WTT) total **17,315 tCO₂e**.
- Fossil fuels for heating are the largest source of emissions from Housing, producing **12,876 tCO₂e** in 2023.
- Emissions from electricity consumption were **4,439 tCO₂e** in 2023.

Upstream well-to-tank (WTT) emissions, associated with the production and transportation of fuels, were **2,606 tCO₂e** in 2023.

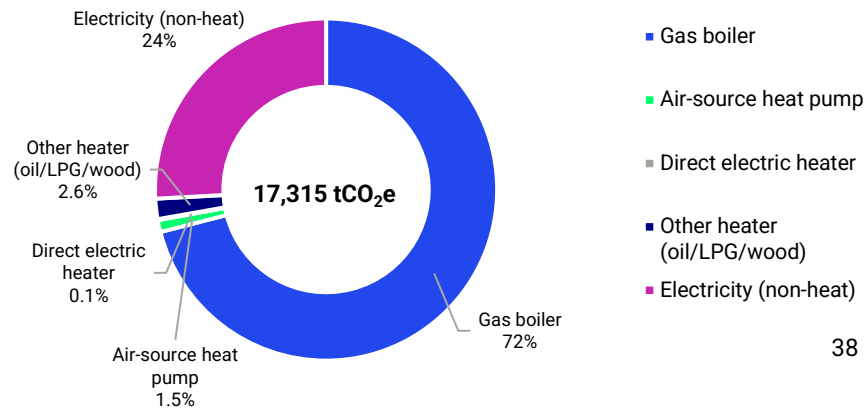
Of the direct emissions from fuel combustion and electricity (17,315 tCO₂e), 72% comes from gas boilers and 24% from ancillary electricity use (i.e. appliances and lighting).

Of the 5,603 tenant properties owned by NSDC, 95% have gas boilers, 2.8% have an air-source heat pump, and 2% use heating oil.

Housing emissions summary (tCO₂e)



Total housing direct emissions by source of energy consumption



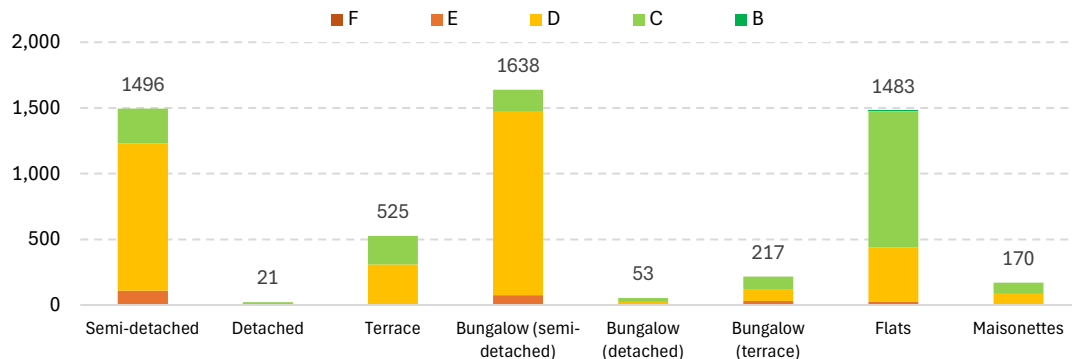
Housing

Breakdown of building types 23/24

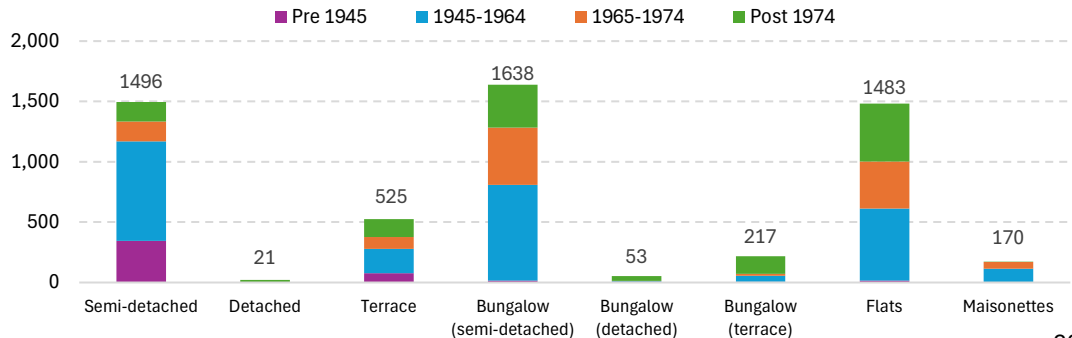
- There are a total of **5,603 tenant properties** in the dataset supplied by NSDC.
- Semi-detached bungalows are the most prominent building type (1,638), the majority of these are EPC D (85%) and almost entirely built after 1945 (99%)
- The next most common building type is semi-detached houses but there are very similar amounts of semi-detached houses and flats.
- 44% of properties were built after 1974 making the building stock relatively modern.

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Number of properties by type and EPC rating



Number of properties by type and construction year



Housing

2019 vs 2024

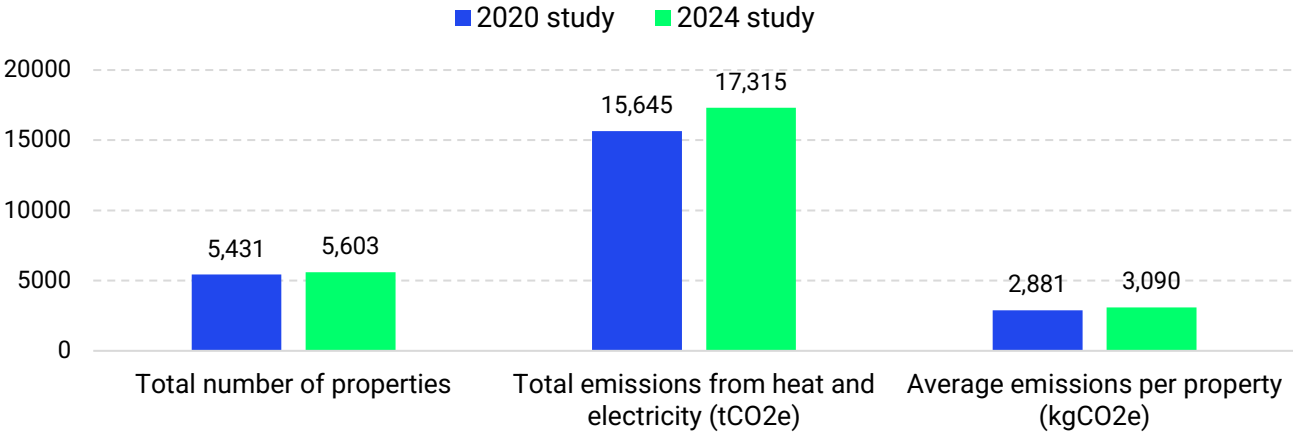


The main changes to the tenant building footprint since 2019 are:

- Increase in the total number of properties included in the analysis, from **5,431 to 5,603**.
- A more accurate methodology was used to estimate building energy consumption – the *Glow Simulator* ([see appendix](#)) uses real half-hourly data from smart meters, in contrast to 2019 which used unreliable EPC cost data and CIBSE benchmarks.

The average emissions per property are similar between the two studies, with a **7% increase between reporting years**. Whilst emissions cannot be directly compared due to the different methodologies. It is expected that average emissions per property would reduce slightly as the building stock modernises, the electricity grid decarbonises, and from fabric retrofits installed over the last 4 years. This indicates that former estimates of emissions were likely to be an underestimate.

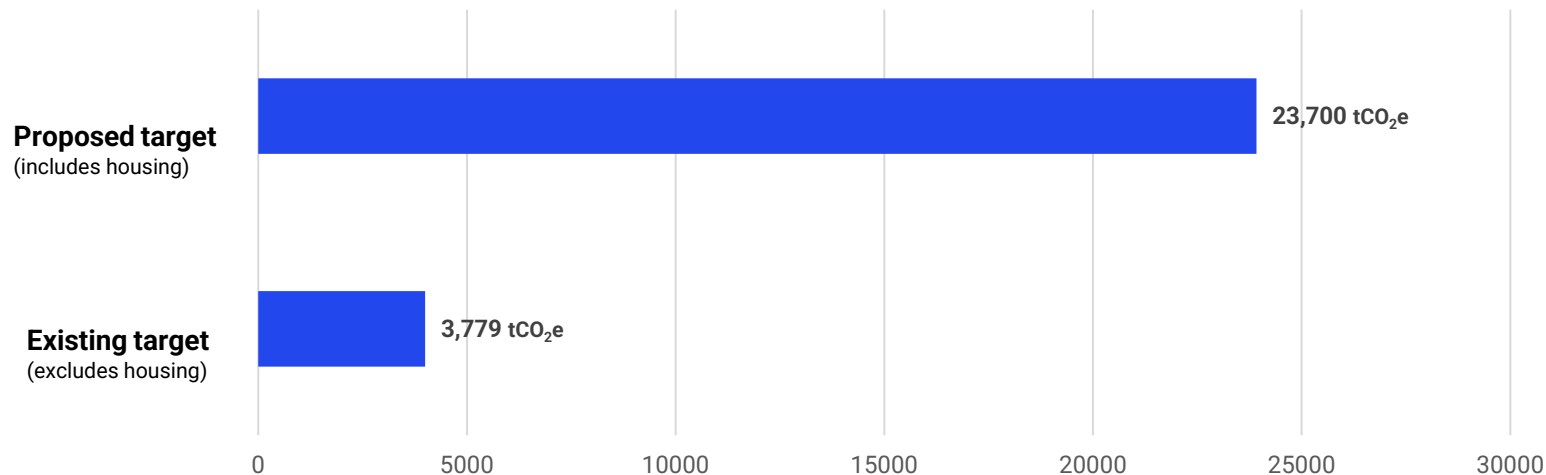
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2035 target

- Total NSDC emissions for the 2023/24 baseline year total **3,779 tCO₂e (excluding housing)** ([emission sources shown here](#)) or **23,700 tCO₂e (including housing)**.
- The existing 2019 baseline was 2,165 tCO₂e, these figures have been updated **2,510 tCO₂e** to include upstream and WTT Scope 3 emissions ([further rationale available here](#)).
- Emissions between 2018/19 and 2023/24 increased by 51% ([see more detail here](#))
- Both options have been considered to allow for the next phase of work where the feasibility of integrating the housing stock (housing emissions) into the existing 2035 target will be considered alongside bringing forward the 2030 target (without housing).

Target emission sources (23/24)



Comparison with 2019

Existing target



NSDC's
existing
2035
carbon
neutral
target

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Emission source	2019 emissions (tCO ₂ e)	2024 emissions (tCO ₂ e)
Electricity (scope 2 & 3)	715	777 (+9%)
Fleet (scope 1, 2 & 3)	1,058	1,415 (+34%)
Natural gas (scope 1, 2 & 3)	715	1,340 (+87%)
Water (scope 3)	10	241 (n/a)
Waste (scope 1)	11	6 (-39%)
Total:	2,510	3,779 (+51%)
Housing	15,645 (direct emissions only)	17,315 (direct emissions only) 19,921 (including WTT)
Purchased goods and services	280	5,074
Business travel	49	86
Leased buildings	408	198
Commuting	108	130

Comparison with 2019

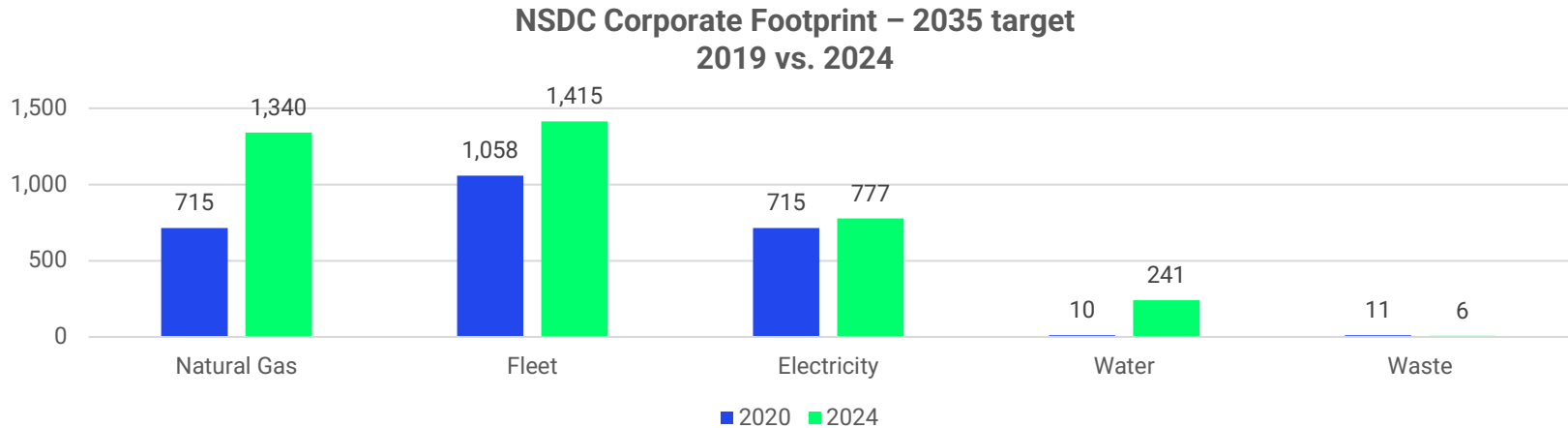
Existing target

Emissions from natural gas, fleet operations, and electricity have increased. While some progress has been made in reducing fleet and natural gas emissions, significant efforts are still needed. Achieving full electrification by 2035 is essential to meet the carbon neutrality target.

The rise in emissions between 2019 and 2024 is primarily driven by:

- 1. An increase in the number of buildings under NSDC’s control
- 2. Expansion of NSDC’s operations and workforce (FTE rising from 493 in 2019 to 587 in 2024)
- 3. Enhancements in accuracy and novel calculation methodology, particularly for PG&S

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Recommendations



As part of NSDC's efforts to continuously improve the accuracy and ease of reporting their carbon footprint, we recommend the following enhancements:

1. **Comprehensive Emission Scope Inclusion:** Ensure all future carbon footprint reports cover all relevant emission scopes, including Scope 1, Scope 2, and Scope 3 – [as shown here](#).
2. **Business Travel Reporting:** Improve internal reporting mechanisms to capture detailed data on business travel, specifically tracking trips using public transportation. This would offer insights into broader travel emissions, helping to identify areas where improvements can be made.
3. **Commuting Survey Implementation:** Conduct regular commuting surveys among all employees to assess the environmental impact of staff travel. By understanding commuting patterns and the associated carbon emissions, NSDC can better implement measures to reduce emissions through initiatives.
4. **Audit of Gas Usage Data:** Since a large proportion of sites currently lack gas usage data, we recommend a full audit of these sites. This should confirm whether they have an active gas supply point by verifying Meter Point Reference Numbers (MPRNs).
5. **Database for Property Information:** Build a database that captures detailed information about each property in NSDC's portfolio. The database should include essential data such as the Unique Property Reference Number (UPRN), building archetype, size, heating system type, and EPC.
6. **Review of Water Usage:** Carry out a review of sites with particularly high-water usage or anomalies in consumption data. Investigate the root causes of unusual water patterns, and implement water-saving strategies where appropriate.
7. **Enhanced EPC Coverage:** Undertake a review to ensure that Energy Performance Certificate (EPC) ratings are available for all properties under NSDC's control.
8. **Purchased Good and Service:** transitioning from spend-based emissions calculations to more accurate and granular methodologies, such as 44 supplier-specific data or product-level life cycle assessments (LCAs).

Target Review

3. NSDC Corporate decarbonisation

Overview



- In 2024, *Be Design* audited the majority of NSDC's corporate buildings, responsible for the majority of natural gas, electricity, waste and water-related emissions. These energy audits provided the basis of the emissions target feasibility appraisal which measures and forecasts emissions arising from **natural gas** and **electricity** usage for 13 of NSDC's buildings.
- The target feasibility appraisal aims to provide NSDC with a preferred pathway to reaching Net Zero for its corporate buildings, considering both the type of interventions and the phasing approach. **Four different scenarios** are modelled to gauge the ambition and deployment rate of interventions highlighted in the audits, and this next section presents the cost and carbon implications for each of these 4 scenarios.
- As part of *Be Design*'s surveys, the theoretical energy usage of each building was estimated. These "model" energy values (in kWh) were used to calculate the energy savings (in kWh) of all the interventions recommended by *Be Design*.
- The baseline emissions associated with these model energy values were calculated by Carbon Trust using 2022 emissions factors and totalled **1,572 tCO₂e**, which equates to **17% of the total footprint** (not including homes). Of these emissions, **825 tCO₂e** are attributed to natural gas consumption, with electricity making up the remaining **747 tCO₂e**. Data on water- and waste-related emissions was not provided and these emissions sources are therefore not considered in this section.
- The emissions target feasibility appraisal builds on the recommended interventions made by *Be Design*. For this reason, the "model" energy values and the associated emissions are used to form the basis of the appraisal. These differ slightly to the electricity and gas emissions calculated as part of the full footprint ([see here](#)) which considered a larger portfolio of buildings.
- The proposed interventions included:
 - LED lighting
 - Fabric upgrades (walls, roof and window glazing)
 - Heat pumps (air source and ground source)
 - Electric heating
 - Roof-mounted solar PV

Corporate buildings

The below table highlights the buildings audited by Be Design, which are included in the target feasibility appraisal. For NSDC to reach Net Zero, they will also need to make efforts to decarbonise other corporate buildings not accounted for in this section.

Buildings included in corporate buildings feasibility appraisal	Emissions calculated using Be Design "model" energy values (tCO ₂ e/year)	Building area (m ²)	Emissions intensity (kgCO ₂ e/m ² /year)
Newark Leisure Centre	580	4,162	139
Dukeries Leisure Centre	219	2,852	77
Blidworth Leisure Centre	23	920	25
Palace Theatre	31	1,508	20
Bunel Drive Depot	80	1,563	51
Newark Beacon	70	2,834	25
National Civil War Centre	11	1,624	7
Farrar Close Store	14	850	16
Farrar Close Office	7	359	19
Castle House	95	3,211	30
Vicar Water	13	232	57
Sconce and Devon Park	10	125	82
Sherwood Arts & Crafts Centre	6	875	7

Scenarios overview



- Emissions reductions were calculated for NSDC's corporate estates using the Be Design report, which presented various decarbonisation interventions and the associated energy savings of each of these interventions for the 13 buildings. A full list of technical assumptions (e.g.: heat pump efficiencies) can be found in the Be Design report.
- Four scenarios** have been modelled to better understand the impact of these different measures and the implementation timelines on the total carbon savings and capital investment required. Two of the scenarios represent a "light retrofit" scenario (3 and 4) , which don't see all the recommended measures implemented.
- Electricity related emissions are modelled using National Grid emissions factors (see Appendix: National Grid Factors), which take the gradual decarbonisation of the electricity network into account as a result of the increased contribution from renewable energy sources.

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ID	Scenario Explanation	Emissions in 2030 (Scope 1 & 2) (tCO ₂ e)	Emissions in 2035 (Scope 1 & 2) (tCO ₂ e)
C1	Deep retrofit (all interventions) implemented by 2030	389	126
C2	Deep retrofit (all interventions) implemented by 2035	563	126
C3	Light retrofit (LED lights and heat decarbonisation*) implemented by 2030	524	170
C4	Light retrofit (LED lights and heat decarbonisation*) implemented by 2035	622	170

*Refers to natural gas boiler(s) being replaced by ASHP, GSHP or electric heating

Phasing buildings



For modelling purposes, we have assumed that the most energy-intensive buildings, those with the highest gas and electricity consumption, will be decarbonised first. However, we recognise that, in reality, prioritisation should take into account a range of additional factors. These factors can significantly influence the feasibility and timing of decarbonisation efforts and might include:

- Building age and condition
- Asset renewal of existing plant
- Leasing arrangements
- Planned maintenance and/or construction projects

• Since it is unlikely that NSDC will implement decarbonisation measures across all 13 buildings simultaneously, a phasing approach was developed to help understand the impact on emissions across the 4 scenarios. Due to their high gas consumption, it is recommended that **decarbonisation efforts are prioritised for the leisure centres** (Phase 1).

• Subsequently, NSDC should focus on tackling all remaining buildings with natural gas and electricity consumption (Phase 2), before finally tackling the purely electric buildings (Phase 3).

• It is important to note that while different phasing approaches will impact the year-on-year emission changes, NSDC can only fulfil their decarbonisation ambitions if all buildings come off natural gas and improve their energy efficiency performance.

• While we recommend that NSDC prioritise sites based on the potential emissions reductions impact, **there may be benefits from a financial perspective to implement certain measures simultaneously across all sites**, particularly LED lighting.

Phasing buildings



A proposed phasing approach of which buildings NSDC should prioritise is presented below. This is indicative in nature and is subject to numerous factors. Ultimately, all buildings will need some level of intervention to meet a Net Zero 2030 or 2035 target. Our model assumes that all buildings at each site are completed at a steady pace within the given phase. For example, in Phase 1 (2030 target), if the phase lasts two years and includes four buildings, we assume two buildings will be completed per year.

	Site	Implementation timeframe, 2030 Target (Scenarios 1 and 3)	Implementation timeframe, 2035 Target (Scenarios 2 and 4)
Phase 1	Newark Leisure Centre Dukeries Leisure Centre Southwell Leisure Centre* Blidworth Leisure Centre	2025-26	2025-28
Phase 2	Palace Theatre Brunel Drive Depot Newark Beacon National Civil War Centre Farrar Close Store Farrar Close Office	2027-28	2029-31
Phase 3	Castle House Vicar Water Sconce and Devon Park Sherwood Arts & Crafts Centre	2029-30	2032-35

*Although not surveyed by Be Design, Southwell Leisure Centre should be considered in the rollout of interventions. Additional surveys will likely be required to identify the optimal decarbonisation methods.

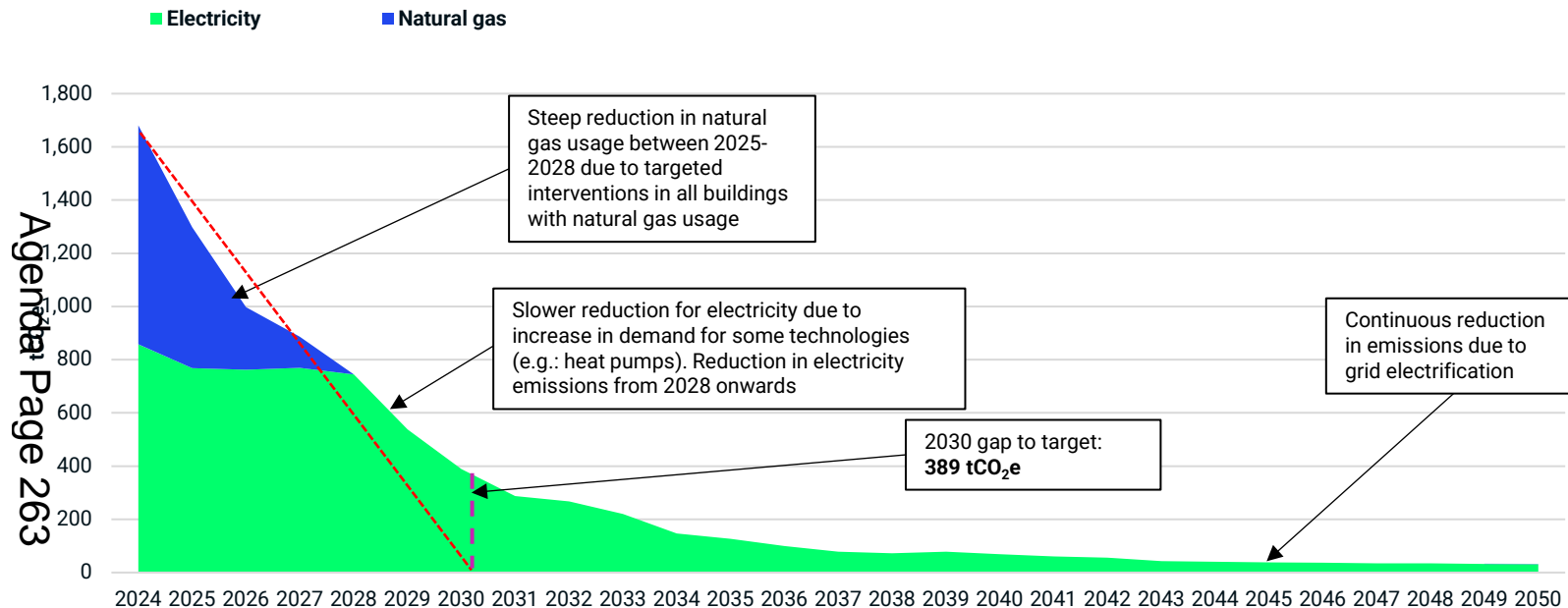
Proposed interventions

The table below highlights the interventions identified by Be Design for each of the audited buildings. Scenarios 1 and 2 see all measures implemented, while scenarios 3 and 4 only model LED lighting and heat electrification.

Site	Intervention Phasing – Scenarios 1 & 2 (deep retrofit)	Intervention Phasing – Scenarios 3 & 4 (light retrofit)
Newark Leisure Centre	LED > ASHP > Solar PV	LED > ASHP
Dukeries Leisure Centre	LED > Fabric > ASHP > Solar PV	LED > ASHP
Blidworth Leisure Centre	LED > Fabric > Solar PV	LED
Palace Theatre	ASHP	ASHP
Funel Drive Depot	LED > Fabric > ASHP > Solar PV	LED > ASHP
Newark Beacon	LED > ASHP	LED > ASHP
National Civil War Centre	LED > ASHP	LED > ASHP
Farrar Close Store	LED > Fabric > ASHP > Solar PV	LED > ASHP
Farrar Close Office	LED > Fabric > Electric Heating > Solar PV	LED > Electric Heating
Castle House	Solar PV	No interventions
Vicar Water	LED > Fabric > ASHP > Solar PV	LED > ASHP
Sconce and Devon Park	LED > Fabric > GSHP > Solar PV	LED > GSHP
Sherwood Arts & Crafts Centre	LED > Fabric > ASHP > Solar PV	LED > ASHP

Scenario 1 – Deep retrofit (all interventions) implemented by 2030

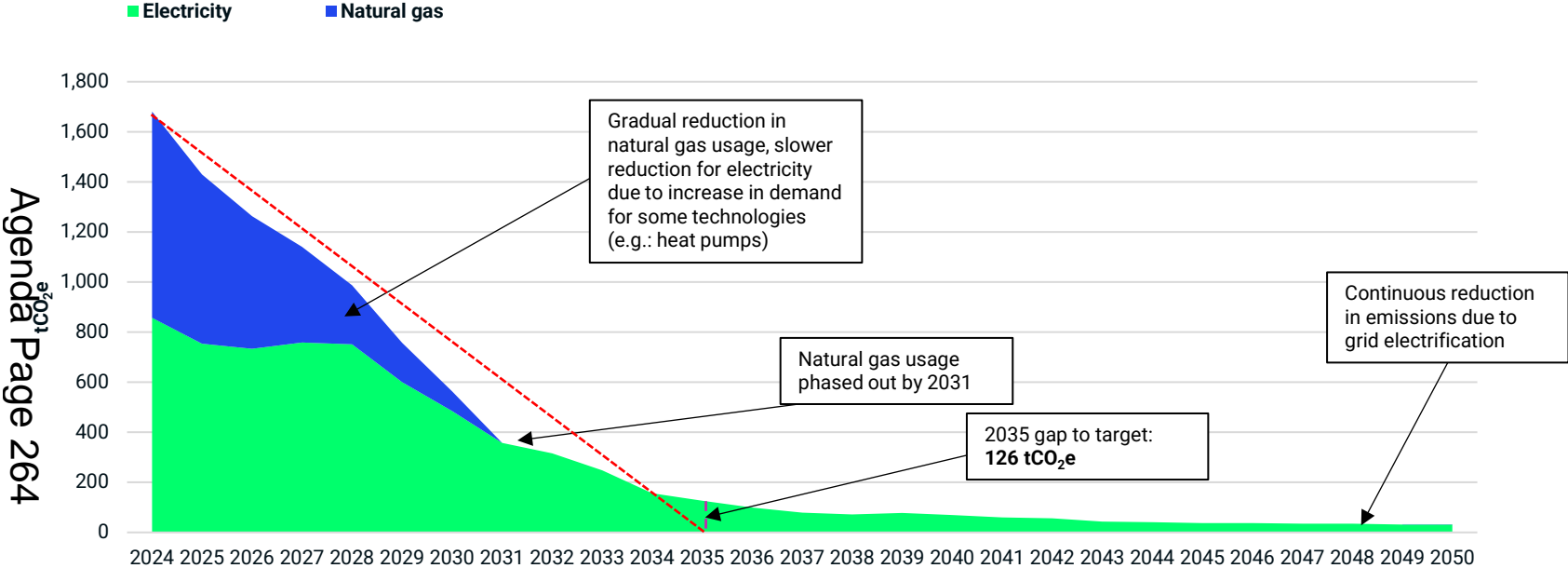
Emissions by fuel type [tCO₂e]



Scenario 2 – Deep retrofit (all interventions) implemented by 2035

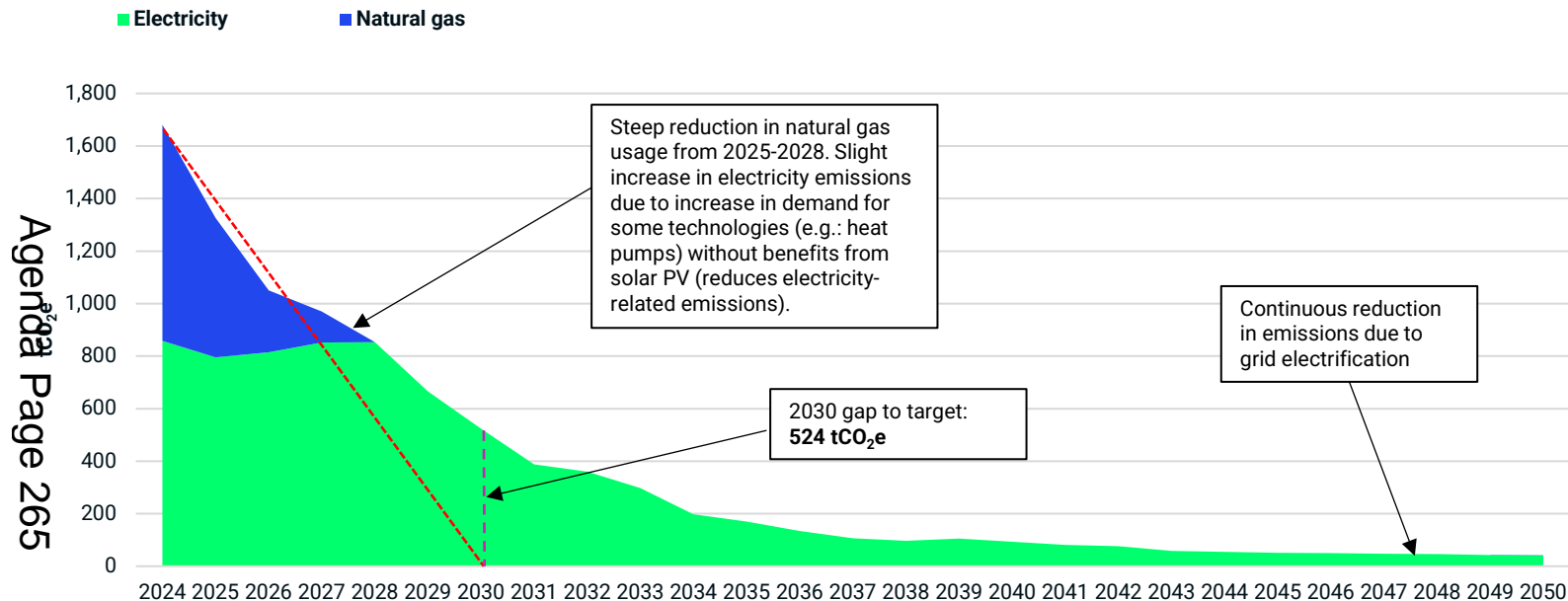


Emissions by fuel type [tCO₂e]



Scenario 3 – Light retrofit (LED lights and heat decarbonisation) implemented by 2030

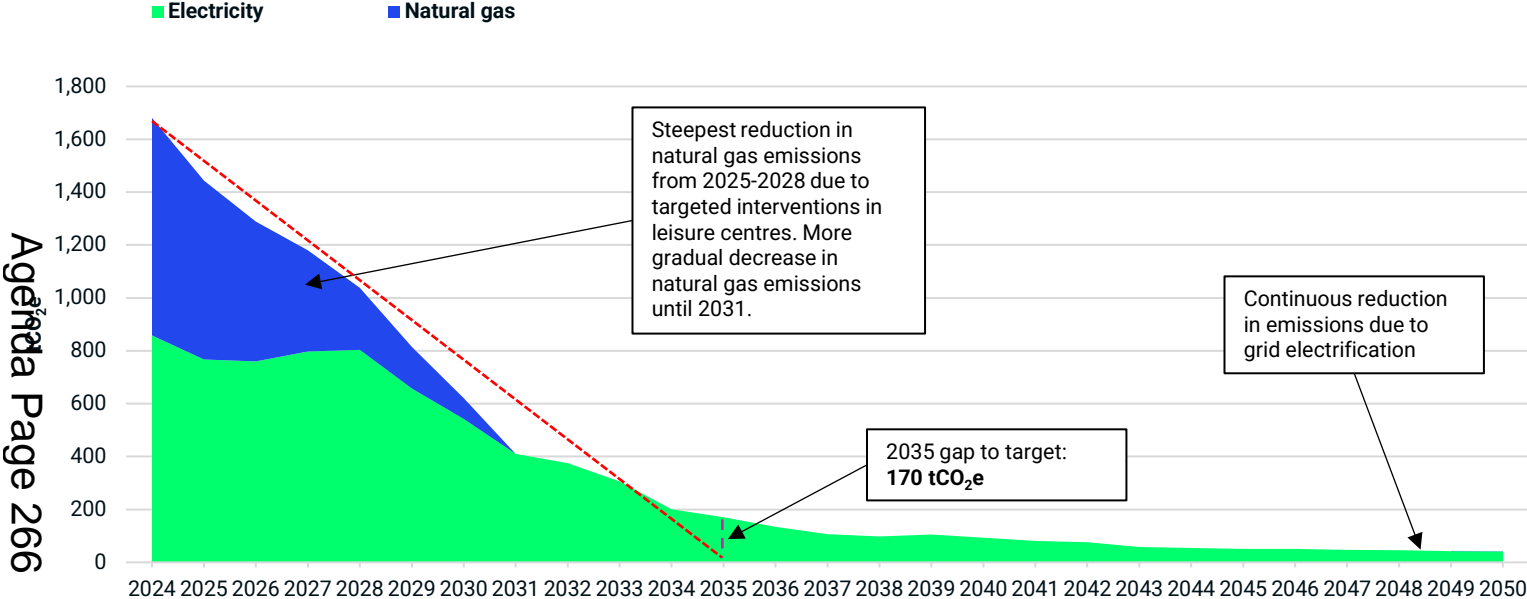
Emissions by fuel type [tCO₂e]



Scenario 4 – Light retrofit (LED lights and heat decarbonisation) implemented by 2035



Emissions by fuel type [tCO2e]



Cumulative emissions

The table below shows the impact of implementing different interventions and target dates across the four scenarios.

1. By moving **target dates from 2035 to 2030** reduces total emissions to 2050 by 1,800 – 2,200 tCO₂e.
2. Pursuing a **deep retrofit strategy over light retrofit** reduces total emissions to 2050 by 900 – 1,300 tCO₂e.

ID	Scenario Explanation	Cumulative emissions to 2035 (tCO ₂ e)	Cumulative emissions to 2050 (tCO ₂ e)
1	Deep retrofit (all interventions) implemented by 2030	11,576	12,381
2	Deep retrofit (all interventions) implemented by 2035	13,801	14,606
3	Light retrofit (LED lights and heat decarbonisation*) implemented by 2030	12,571	13,656
4	Light retrofit (LED lights and heat decarbonisation*) implemented by 2035	14,429	15,515

*Refers to natural gas boiler(s) being replaced by ASHP, GSHP or electric heating

Costs



The table below highlights the impact of each of the 4 scenarios on target year emissions, as well as the capital investment required to implement all of the identified interventions. A breakdown of costs per intervention is presented on the next slide.

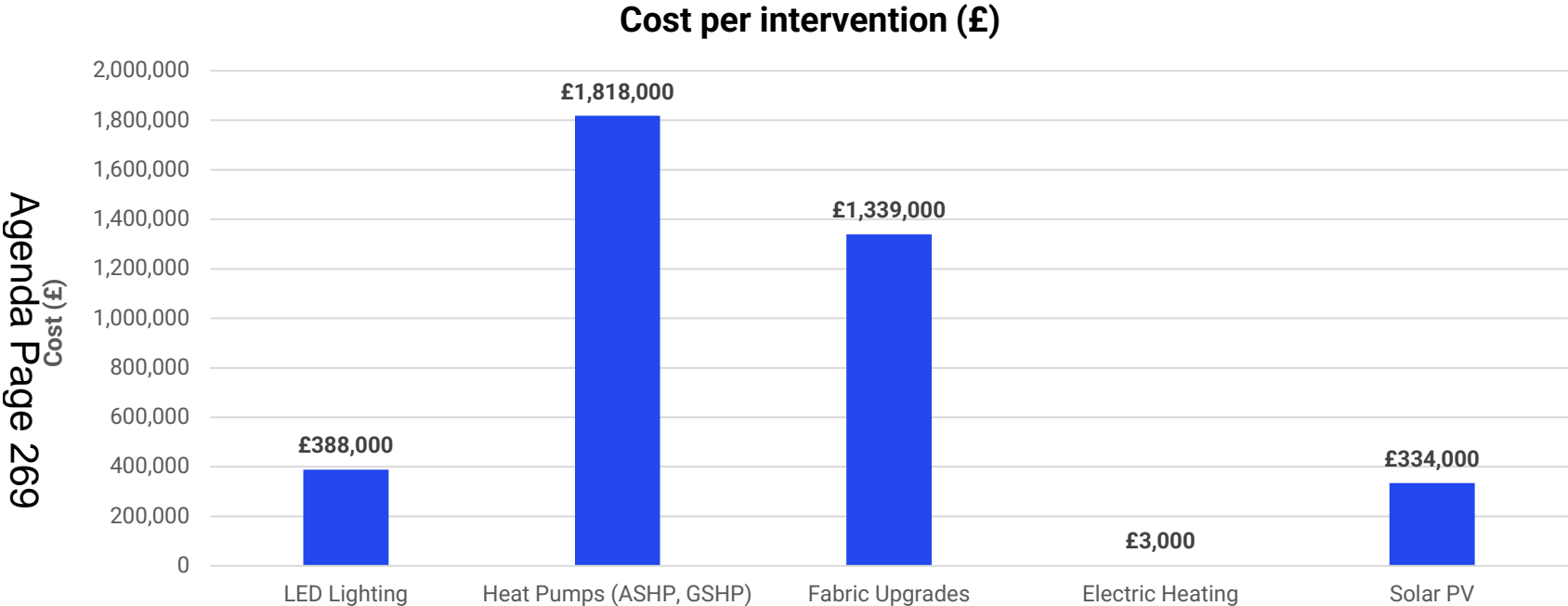
- All costs are provided by Be Design and are indicative in nature. Costs for Southwell Leisure Centre are not included in the figures presented below.
- A full list of cost assumptions can be found in the [Appendix](#).

ID	Scenario Explanation	Baseline Emissions	Residual emissions by 2030 (tCO ₂ e)	Residual emissions by 2035 (tCO ₂ e)	Capital Investment (£)
1	Deep retrofit (all interventions) implemented by 2030	1,572	389	126	£3,882,000
2	Deep retrofit (all interventions) implemented by 2035		791	126	£3,882,000
3	Light retrofit (LED lights and heat decarbonisation*) implemented by 2030		524	170	£2,209,000
4	Light retrofit (LED lights and heat decarbonisation*) implemented by 2035		865	170	£2,209,000

*Refers to natural gas boiler(s) being replaced by ASHP, GSHP or electric heating

Cost breakdown

The graphic below provides a breakdown of the capital investment required to implement each intervention identified by Be Design. [This page](#) summarises which interventions apply to which buildings.



Conclusions & Recommendations



This section has provided various pathways to help NSDC identify the most appropriate route to decarbonising 13 of their corporate buildings.

- The different pathways see **emissions savings of 950 – 1,446 tCO₂e**, depending on the level of retrofit and target year.
 - The existing BE Design covered the majority of buildings, NSDC will need to make **additional efforts to decarbonise their remaining buildings** not covered by these surveys, with particular emphasis on Southwell Leisure Centre.
 - NSDC should be aware that the capital investment and associated emissions reduction of this **target feasibility appraisal only considers natural gas and electricity emissions**, and additional efforts will be required to reduce emissions from other sectors, such as waste, water and PG&S.
- The total baseline footprint totals 9,267 tCO₂e. As a result, the **proposed interventions only tackle 10-16% of total emissions**, not including emissions arising from housing.
- Going forward, NSDC will need to ensure that **energy consumption is recorded clearly and consistently**, in order to continuously improve the accuracy of subsequent carbon footprints and the impact of any interventions. This will include a review of all building metering arrangements and heating technologies.
- The exact phasing of which buildings and/or interventions to prioritise will depend on a multitude of factors, and NSDC should aim to identify opportunities that will reduce capital costs, such as benefiting from economies of scale (e.g.: implementing LED lighting across all sites) or making strategic decisions around when to install heat pumps (e.g.: if a boiler is nearing end-of-life). Most importantly, NSDC need to be aware that **all buildings will need some level of intervention** to minimise the residual emissions by 2030 or 2035.

Target Review

4. Housing decarbonisation

Overview

NSDC's housing portfolio of 5,603 houses is not currently included within the existing 2035 target. We have explored options for inclusion into the existing 2035 target or inclusion into an alternate 2050 target for **housing only**. Comparison of emissions to 2018/19 can be [found here](#).

Baseline:

- Baseline emissions (2023/24), **19,921 tCO₂e**, with 75% of emissions from heating.
- Of the total emissions, **17,315 tCO₂e** are attributed to direct emissions (i.e. excluding those from WTT)
- 97% of houses rely on burning fossil fuels (gas, oil, LPG), the remainder use electricity (resistance/heat pumps) or wood burners.

Carbon Reduction Pathways (more detail overleaf)

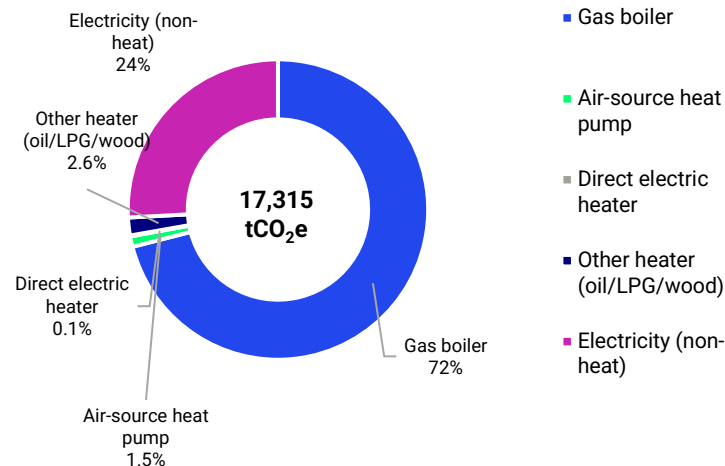
- Low retrofit scenario – improve energy efficiency for poorly rated housing (EPC D-e), with full electrification of all buildings.
- High retrofit scenario - extensive energy efficiency improvements (whole house deep retrofit, solid wall insulation) with full electrification

Decarbonisation targets:

- 2035 target: retrofit ~560 houses/year, ~£8m - £15m CAPEX per annum.
- 2050 target: retrofit ~220 houses/year, ~£3m - £6m CAPEX per annum.

NB. Significant offsets required in all scenarios to achieve carbon neutrality due to residual emissions present in the electricity grid.

Total housing direct emissions by source of energy consumption



Methodology overview

To model the impact of different interventions on NSDC's housing stock, EPC data provided by NSDC was used to understand the existing energy use.

- Hydrogen was not selected as a heating solution due to several challenges, including its lower efficiency compared to heat pumps, high production costs, and the current lack of infrastructure for widespread domestic use. The UK Government is set to make announcement in 2026 regarding the future of hydrogen for home heating.
- To model the decarbonisation of heat, heat pumps were chosen as the primary solution due to their high efficiency and ability to significantly reduce carbon emissions compared to conventional heating systems. Heat pumps offer a proven, readily deployable technology that aligns with the UK's decarbonisation goals.
- Heat pumps can utilise energy from a range of sources including the surrounding air, geothermal energy stored in the ground, or nearby sources of water or waste heat from a factory.
- Deep retrofit of properties will require significant enhancements in the energy efficiency of the property, with multiple major interventions required to enhance energy efficiency.
- Assumptions from the baseline and modelling of housing decarbonisation can be [found in the appendix](#).



Interventions

To model the impact of differing strategies for decarbonising housing, two core strategies were developed for each archetype.

- Low retrofit represents a scenario where basic energy efficiency improvements (e.g. loft insulation) are made to older and worst performing properties with full electrification through the installation of heat pumps.
- High retrofit represents a scenario where most properties undergo extensive energy efficiency improvements (whole house deep retrofit, solid wall insulation) with full electrification through the installation of heat pumps. Deep retrofit implies that each property will have to undergo multiple energy efficiency measures.

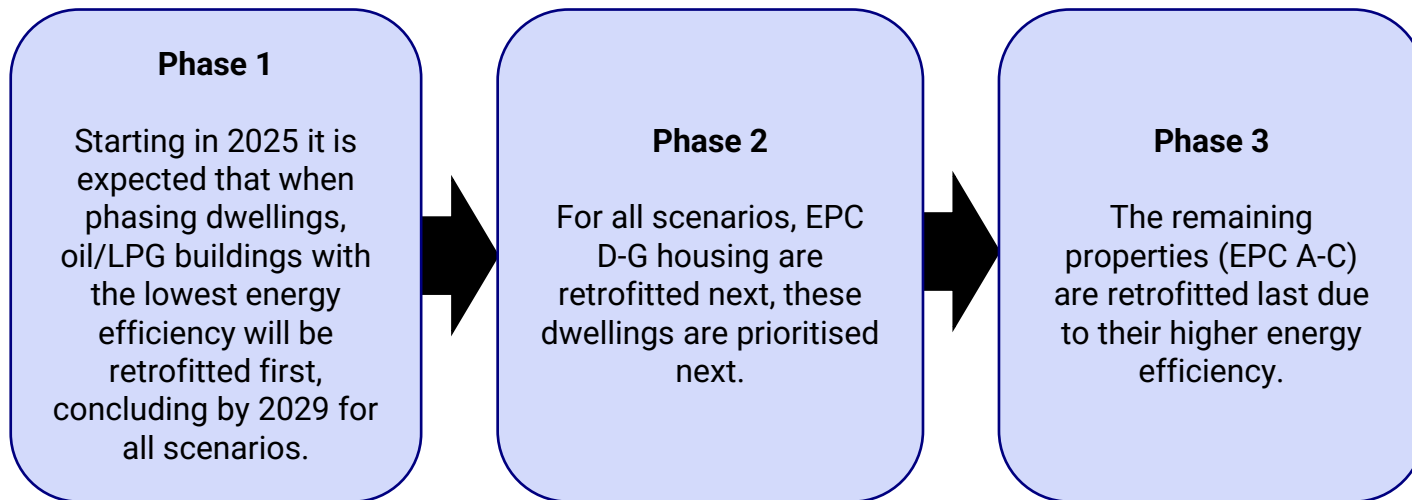
A summary of interventions for the top 3 archetypes is available below, full details of all the interventions and CAPEX that were modelled for all archetypes can be found in [Appendices](#).

	Low retrofit scenario	High retrofit scenario
Post 1930 bungalow; On-gas D-G	Individual 6kW ASHPs plus basic energy efficiency measures.	Whole house deep retrofit to net zero energy standard including 6kW ASHP and a package of insulation and air tightness measures.
Post 1930 flat; On-gas A-C	Individual heat pump within each flat (4kW). Update hot water cylinders.	Individual heat pump within each flat (4kW). Update hot water cylinders plus air tightness improvements.
Post 1930 semi-detached house; On-gas D-G	Individual 8kW ASHPs plus basic energy efficiency measures.	Whole house deep retrofit to net zero energy standard including 6kW ASHP and a package of insulation and air tightness measures.

Phasing

To model the decarbonisation of the housing stock, the following steps were taken to phase dwellings. This approach ensures that the most carbon-intensive buildings are addressed early, maximising the impact of emissions reductions.

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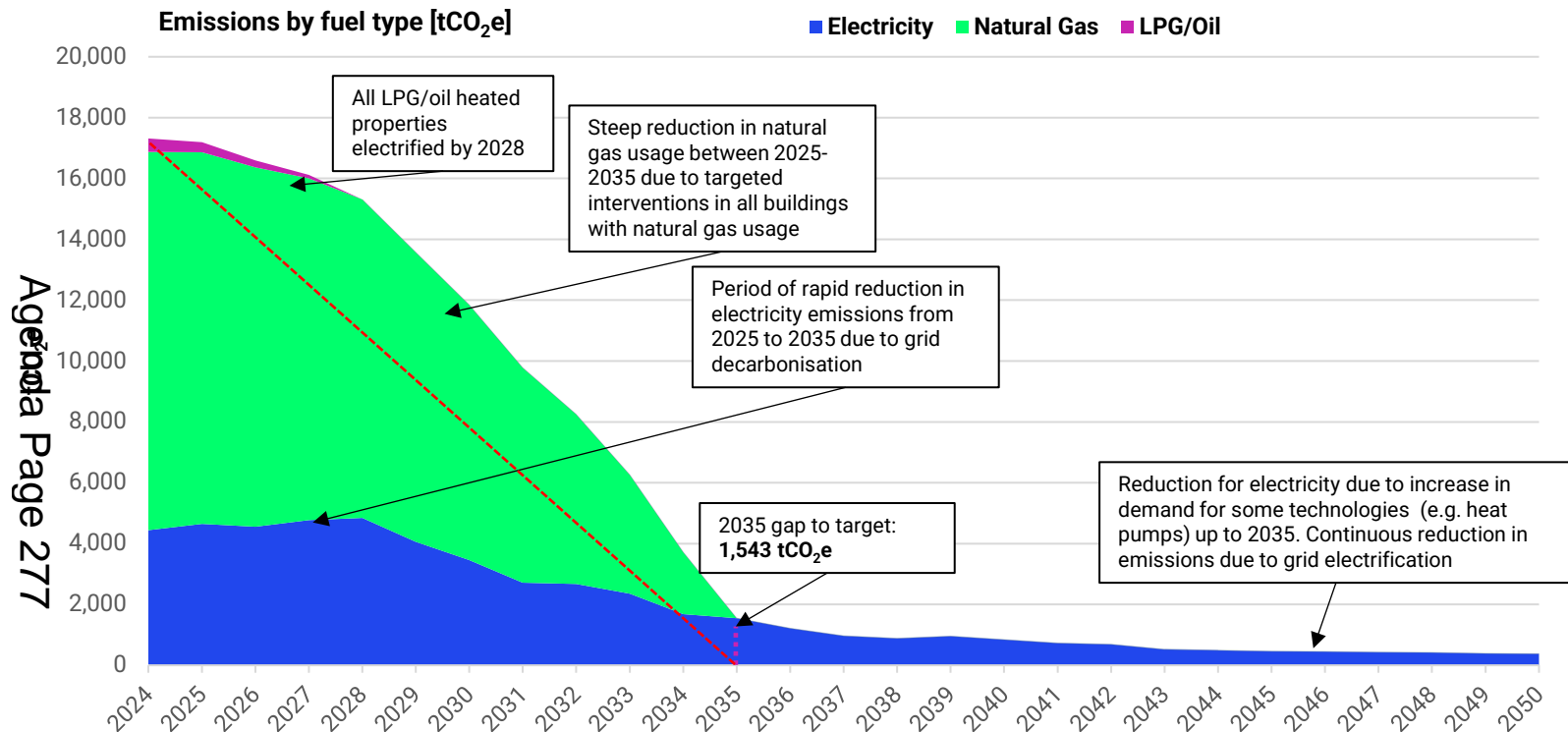
Scenario overview



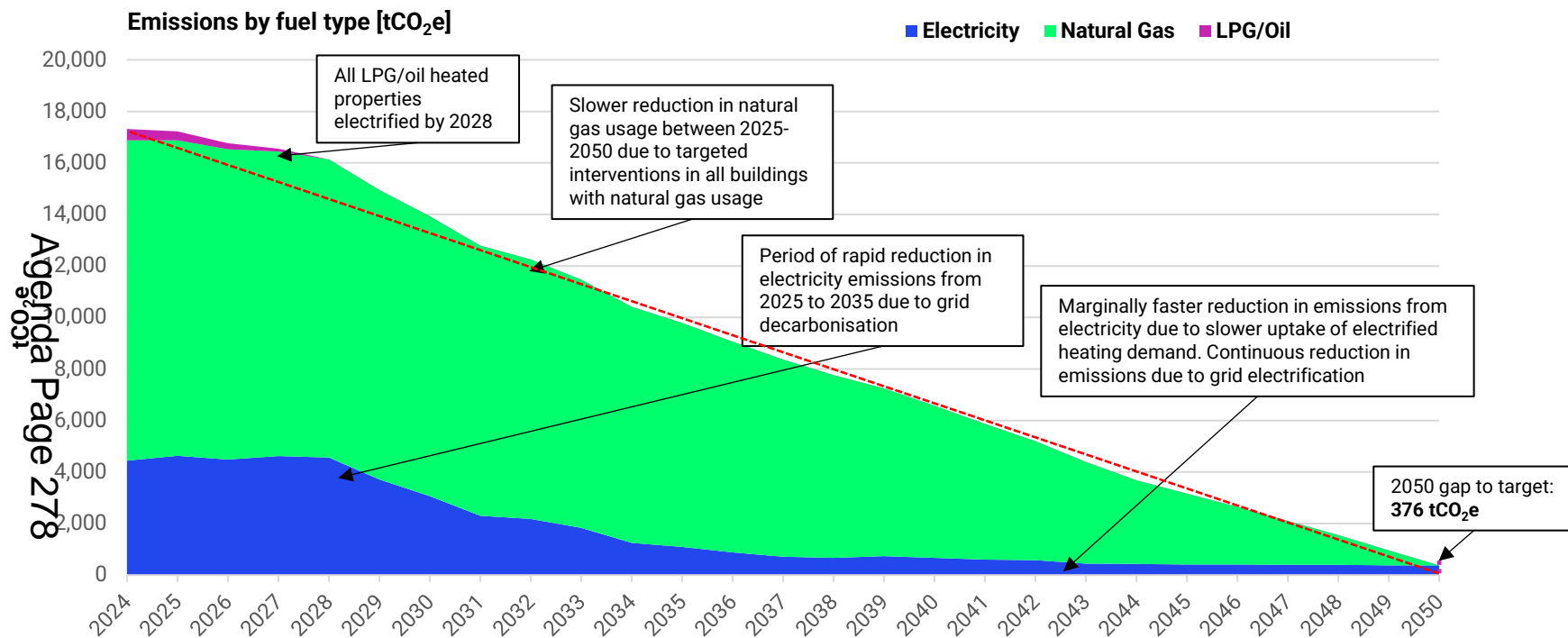
- Energy use and emissions reductions were calculated for NSDC's housing.
- Carbon savings and associated costs for each of the decarbonisation interventions are calculated based on two retrofit options, targeting either 2035 or 2050.
 - High retrofit: All houses have energy efficiency measures and heat electrified.
 - Light retrofit: Some houses (EPC C-G) have energy efficiency measures and all housing have heat decarbonised

ID	Scenario Explanation	2030 emissions remaining (tCO ₂ e)	2035 emissions remaining (tCO ₂ e)	2050 emissions remaining (tCO ₂ e)	Total emissions to 2050 (tCO ₂ e)
H1	High retrofit: All houses have extensive energy efficiency measures and heat decarbonised by 2035	11,847	1,543	376	147,348
H2	High retrofit: All houses have extensive energy efficiency measures and heat decarbonised by 2050	13,970	9,818	376	238,287
H3	Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2035	11,933	1,624	395	148,620
H4	Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2050	13,928	9,788	395	238,562

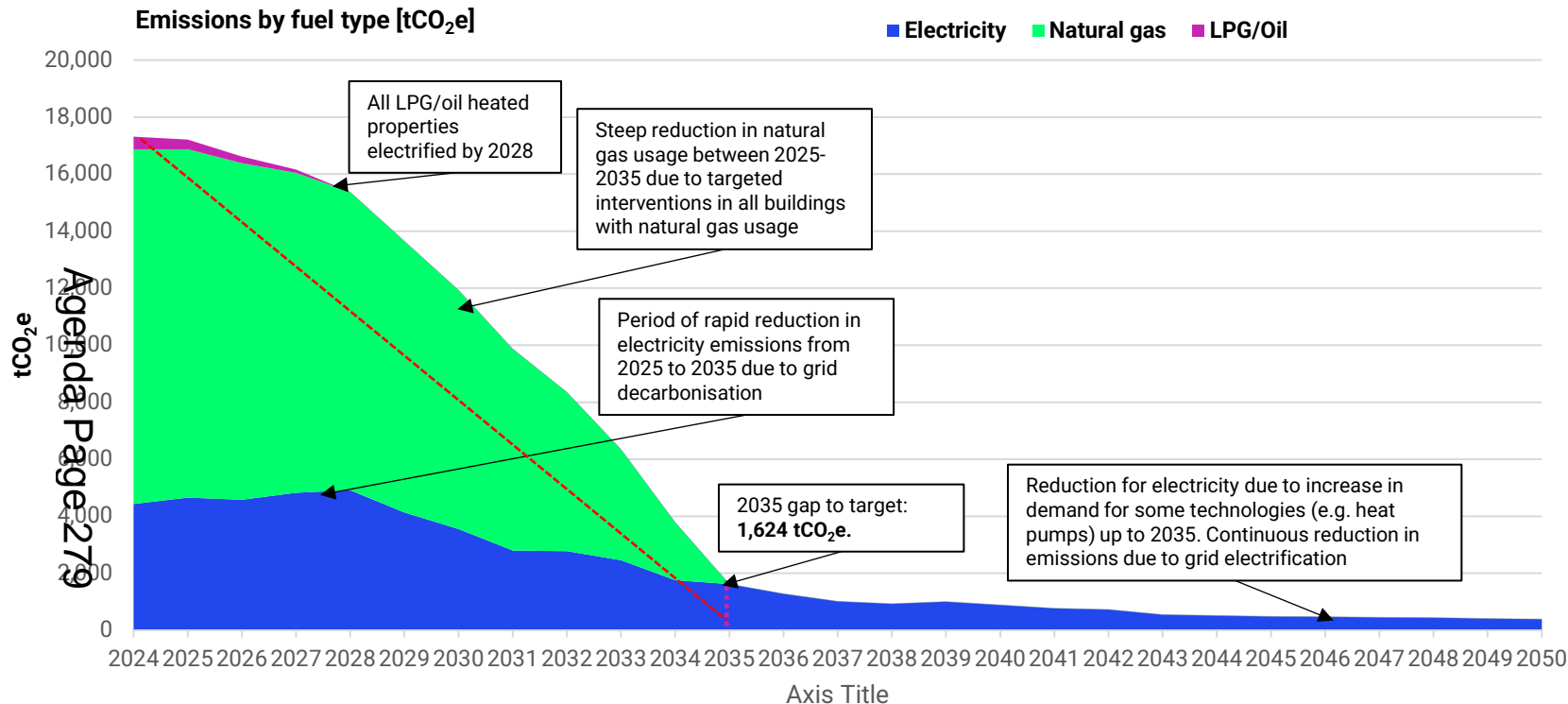
Scenario 1: High retrofit: All houses have extensive energy efficiency measures and heat decarbonised by 2035



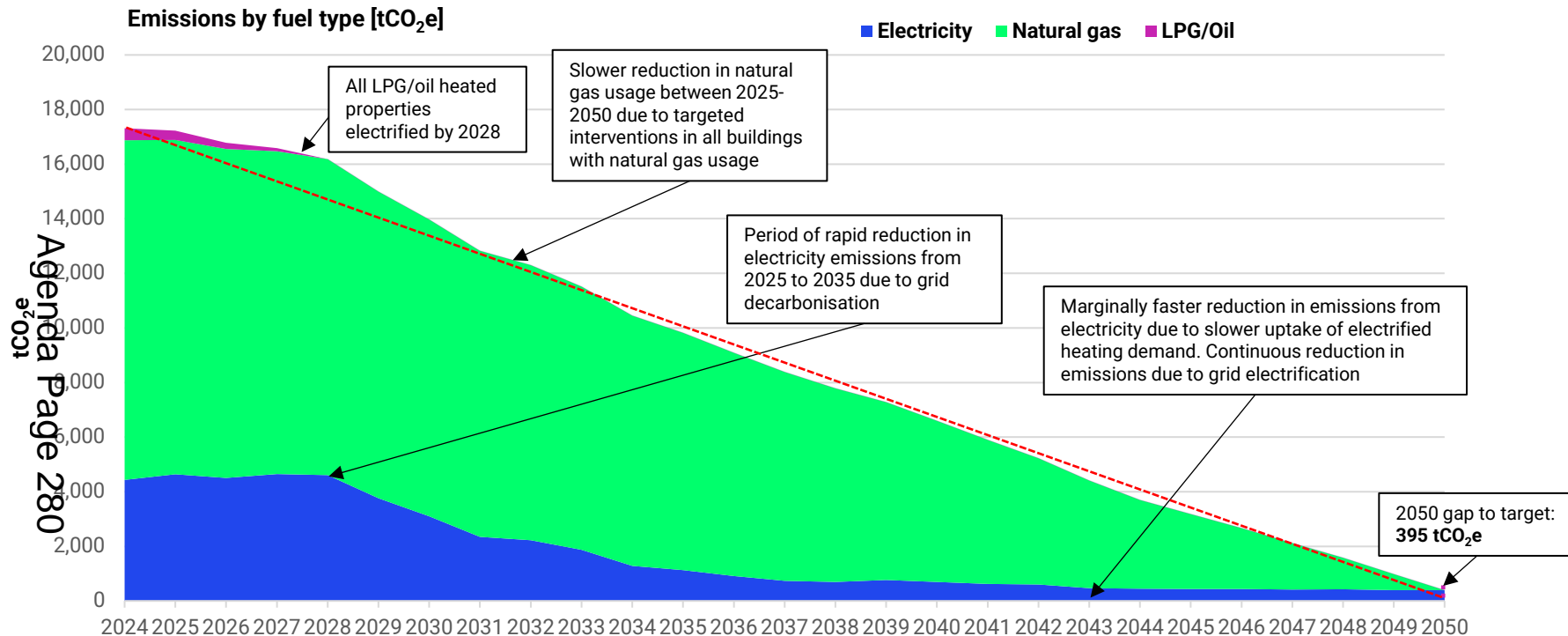
Scenario 2: High retrofit: All houses have extensive energy efficiency measures and heat decarbonised by 2050



Scenario 3: Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2035



Scenario 4: Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2050



Costs



The estimated capital expenditure (CAPEX) varies significantly across scenarios, as illustrated in the table.

High retrofit scenarios incur considerably higher costs, ranging from £139m to £145m, with annual estimates of £14.5m for the 2035 target and £5.6m for the 2050 target.

In contrast, the light retrofit scenario requires £76m across both target years, with annual costs estimated at £7.6m for 2035 and £3m for 2050.

This analysis indicates that the speed of retrofitting properties, whether faster or slower, has minimal impact on the overall CAPEX required. Instead, the primary constraints in decarbonisation are expected to be staff resourcing, annual capital allowances, and supply chain capacity.

Notes:

- Inflation has not been considered in the costings, figures presented in the table represent 2024 prices.
- Running costs, such as OPEX and general maintenance, are not included in the costings.
- Decreases and/or increases in natural gas and electricity bills as a result of the interventions are not included in the costings.

Scenario	Est. total CAPEX	Est. CAPEX (per year)
H1: High retrofit 2035	£145m	£14.5m
H2: High retrofit 2050	£139m	£5.6m
H3: Light retrofit 2035	£76m	£7.6m
H4: Light retrofit 2050	£76m	£3m

Deployment

NSDC currently estimates that they currently have the capacity to retrofit 100 buildings per year. In all scenarios, a significant increase in this existing capacity will be required to meet the proposed targets.

Scaling the installation rate earlier will result in faster progress towards decarbonisation.

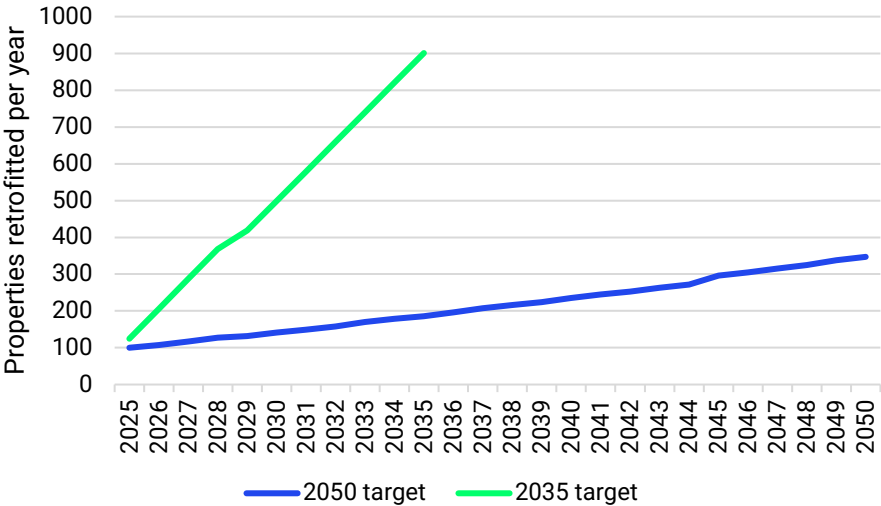
The required increase in installation rates is the same for both high and light retrofits, since it is based purely on the number of properties retrofitted, this does not consider the additional staff likely needed for high retrofits.

Deep retrofits typically take longer to complete, making higher staffing levels essential to meet the targets.

The table illustrates the average number of properties that need retrofitting annually to achieve decarbonisation by the target date. To support emissions modelling, required increases in installation capacity have also been considered, as shown in the graph.



Installation rates required for different Carbon Neutral targets



Target year	Houses retrofitted per year
2035	560
2050	220

Target Review

5. Target review

Overview



NSDC already has a 2035 Carbon Neutrality target, covering corporate (buildings), waste and water, and fleet. This section explores the feasibility of three potential targets alongside Business as Usual based on the scenarios developed for NSDC Corporate (C1-4) and Housing (H1-4), compared with this existing 2035 target.

Overview of the targets is available below, providing detail on how they would differ from NSDC's existing target.

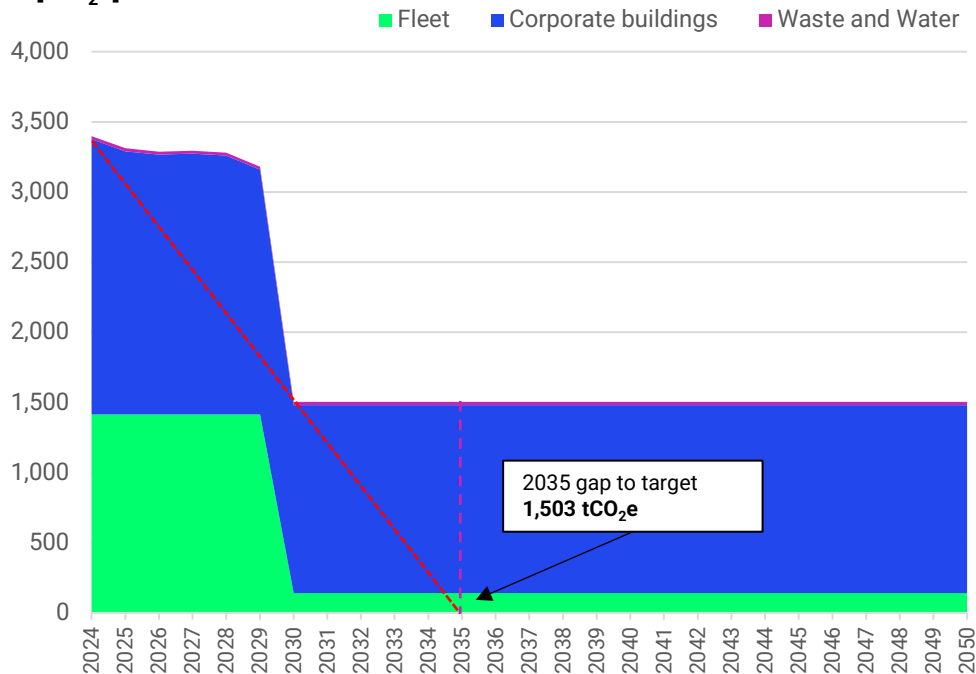
Potential target	Changes to the existing 2035 target
2030 target: moving existing target forwards to 2030	Moving the existing target forwards by 5 years to 2030, keeping the emission sources the same.
2035 target: integrate housing with the existing 2035 target.	Integrate housing with the existing 2035 target.
2050 housing target: a separate housing-specific target aims to achieve carbon neutrality by 2050, in addition to NSDC's existing 2035 target.	In addition to the existing 2035 target, this would involve creating a separate 2050 target for the decarbonisation of housing only.

Business as usual

In this business-as-usual scenario, the existing 2035 target is established, incorporating initiatives already considered by NSDC, such as HVO for fleet (90% emissions reduction) and a green tariff for electricity by 2030.

- Other initiatives, like tree planting and solar PV, are acknowledged but not included in the pathway due to uncertainties about their impact.
- Achieving carbon neutrality under this plan will require carbon offsets of 1,503 tCO₂e in 2035. (£30k - £75k per annum)
Tree-planting schemes are expected to sequester 338 – 1,351 tCO₂e per annum.
- This pathway continues to use natural gas to 2050 and is heavily reliant on biofuels. While HVO is stated to reduce emissions by 90%, this does not account for significant indirect land-use changes, biodiversity loss, or the full lifecycle footprint of biofuel production.
- [Further details on our recommended positioning on HVO are available here.](#)
- Given these challenges, there is a need to explore more sustainable long-term solutions, such as electrification for heating and transport.

Business as usual
(sustainable electricity tariff, grid decarbonisation and HVO)¹
[tCO₂e]



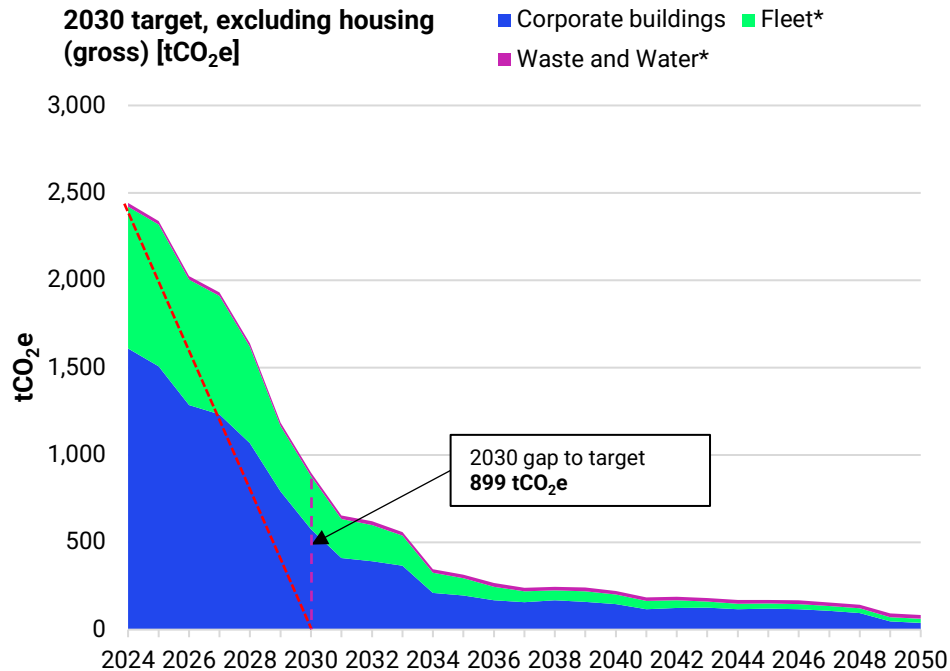
¹There are variations in the emissions reported from fleet and corporate emissions as the methodology varies from other pathways explored in this report.

2030 target: moving existing target

Under the most ambitious emissions target, all Scope 1 emission sources (e.g., natural gas, diesel, petrol) are fully electrified by 2030. This would involve moving the existing 2035 target forwards by 5 years.

- By the target year, emissions are projected to decrease by 63%. This reduction accounts for residual emissions associated with electricity generation.
- Achieving carbon neutrality under this target will require extensive carbon offsets, estimated at ~900 tCO₂e. (£20k - £45k per annum)
- The capital investment required from NSDC is anticipated to be £2.2m for corporate with additional costs expected for further buildings, waste and water, and fleet.
- Decarbonising houses has been excluded from this target, as addressing all housing by 2030 is not considered feasible.

2030 target, excluding housing (gross) [tCO₂e]



Corporate emissions pathway modelled using Scenario 3, light retrofit (LED lights and heat decarbonisation) implemented by 2030

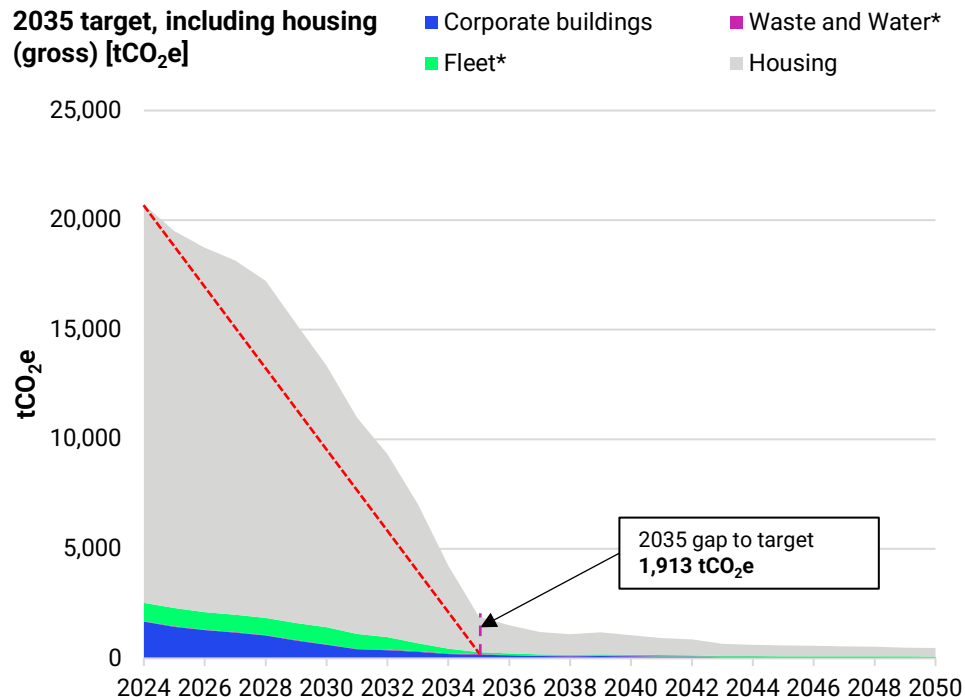
*Emission projections for these emission sources have been carried across from the existing study as they weren't included in this study. All emissions intensity factors (e.g. gCO₂e/kWh) have been updated to reflect the most recent projections.

2035 target: increasing boundary of existing target

Under the 2035 emissions target pathway, all Scope 1 emission sources, including housing (e.g., natural gas, diesel, petrol) are fully electrified by 2035.

- By the target year, emissions are projected to decrease by 91%. This reduction accounts for residual emissions associated with electricity generation.
- Achieving carbon neutrality under this target will require extensive carbon offsets, estimated at ~1,900 tCO₂e. (£40k - £100k per annum)
- The analysis estimates that decarbonising corporate buildings and housing in this scenario will require £78m of capital expenditure, with additional costs expected for all buildings, waste and water, and fleet.
- Due to this substantial capital investment, significant increases in staffing are required to execute the extensive capital delivery program.
- This target is currently not considered feasible without a significant increase in capacity and access to capital funding for retrofits.
- [See here for more detail on the required rates to deliver each target year.](#)

2035 target, including housing (gross) [tCO₂e]



Corporate emissions pathway modelled using Scenario 4, light retrofit (LED lights and heat decarbonisation) implemented by 2035. Housing emissions modelled using Scenario 2, Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2035.

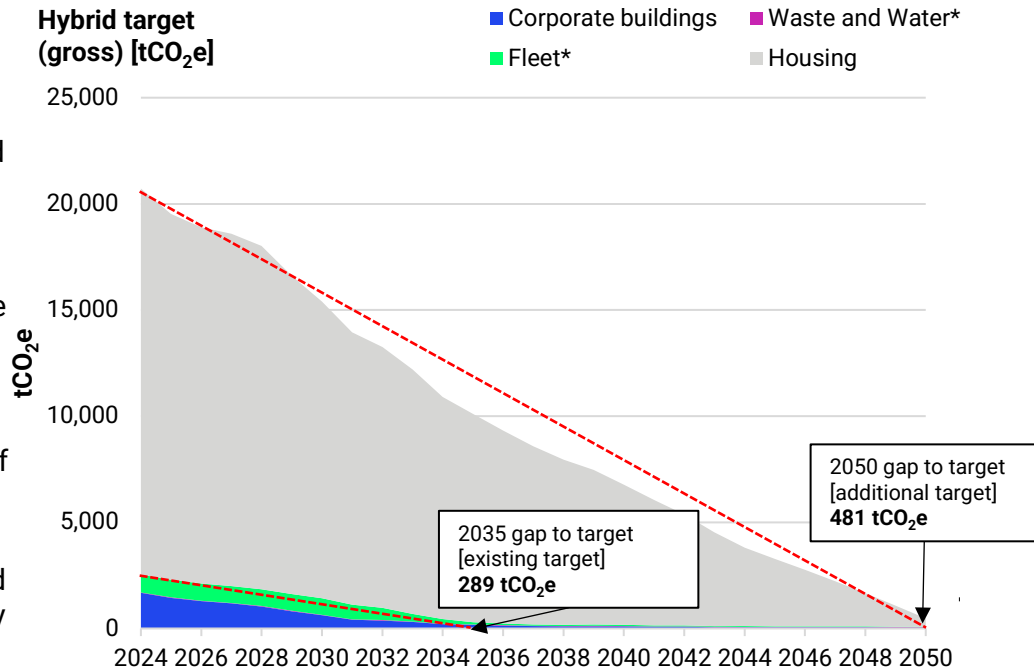
*Emission projections for these emission sources have been carried across from the existing study as they weren't included in this study. All emissions intensity factors (e.g. gCO₂e/kWh) have been updated to reflect the most recent projections.

2050 housing target: new target for housing only

Under the final proposed target, a hybrid approach is proposed. In this scenario, two emission targets would be created, the existing 2035 target and a separate housing-specific target aiming to achieve Net Zero by 2050.

- By 2035, emissions are projected to decrease by 51%, and by 2050, the reduction is expected to reach 98%, inclusive of residual emissions from electricity generation.
- Achieving carbon neutrality under this plan will require carbon offsets: 289 tCO₂e in 2035 (offsets for housing are not yet needed) and 481 tCO₂e in 2050 after the housing target is met (£10k - £25k per annum).
- The analysis estimates that decarbonising corporate buildings and housing in this scenario will require £78m of capital expenditure, with additional costs expected for all buildings, waste and water, and fleet.
- This target still involves significant capital investment and additional staffing to support a large-scale capital delivery program for corporate buildings and housing.
- Compared to other targets, this plan is considered the most achievable within the existing capacity for delivering retrofits.

**Hybrid target
(gross) [tCO₂e]**



Corporate emissions pathway modelled using C4, light retrofit (LED lights and heat decarbonisation) implemented by 2035. Housing emissions modelled using H4, Light retrofit: Some houses (EPC D-G) have energy efficiency measures and heat decarbonised in all housing by 2050.

*Emission projections for these emission sources have been carried across from the existing study as they weren't included in this study. All emissions intensity factors (e.g. gCO₂e/kWh) have been updated to reflect the most recent projections.

Overview

Following the development of scenarios for NSDC Corporate (C1-4) and Housing (H1-4), this section explores the feasibility of achieving different target dates (2030, 2035 and 2050) across different scenarios, compared with the existing 2035 target.

The three different targets with varying scopes are explained in the table below.

We recommend that NSDC consider retain its existing 2035 target while introducing a new 2050 target for housing, as this is likely to be the most feasible pathway to achieving full decarbonisation.

Potential target	Scope	Emissions reduction by 2030	Emissions reduction by 2040	Total emissions (to 2050)	Estimated CAPEX (excludes fleet, water and waste)
Business as usual: 2035 target with green electricity tariff and HVO	<ul style="list-style-type: none"> Corporate buildings Water and waste Fleet 	-56%	-56%	51,302 tCO₂e	n/a
2030 target: 2030 target: moving NSDC's existing target to 2030	<ul style="list-style-type: none"> Corporate buildings (C3) – light retrofit by 2030 Water and waste Fleet 	-63%	-91%	17,700 tCO₂e	£2.2m (corporate only)
2035 target: integrate housing with the existing 2035 target.	<ul style="list-style-type: none"> Corporate buildings (C4) – light retrofit by 2035 Housing (C3) – light retrofit by 2035 Water and waste Fleet 	-36%	-95%	168,855 tCO₂e	£78m (corporate and housing only)
2050 housing target: a separate housing-specific target aims to achieve carbon neutrality by 2050, in addition to NSDC's existing 2035 target.	2035 target (existing) <ul style="list-style-type: none"> Corporate buildings (C4) – light retrofit by 2035 Water and waste Fleet 2050 housing target <ul style="list-style-type: none"> Housing (H4) – light retrofit by 2050 	-25%	-67%	259,522 tCO₂e	£78m (corporate and housing only)

Offsetting standards and frameworks

NSDC is expected have some residual emissions in 2035 and offsetting will be required to achieve their carbon neutral ambition, there are currently three main standards that outline approaches to offsetting:



Science-based target initiative net-zero corporate standard

October 2021

First net-zero standard that private-sector organisations can be accredited against



COP26 Universities Network: FE and HE carbon offset briefing

January 2021

Guidance to support the development of further and higher education offsetting policies

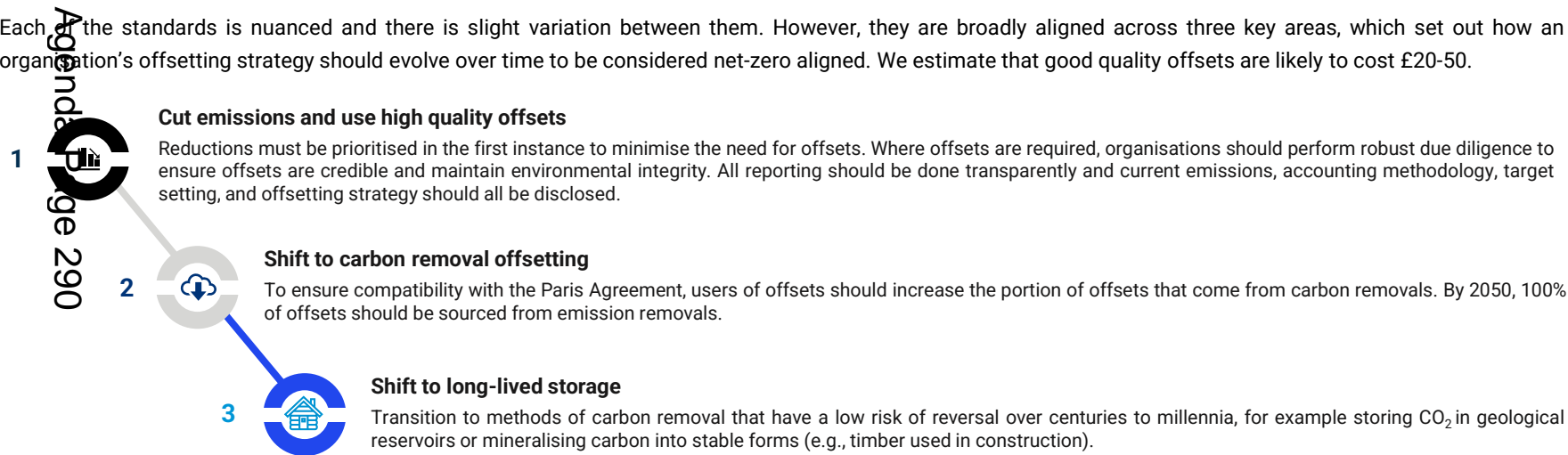


The Oxford Principles for Net Zero Aligned Carbon Offsetting

September 2020

Outline of key principles required to ensure offsetting helps to achieve a net-zero society

Each of the standards is nuanced and there is slight variation between them. However, they are broadly aligned across three key areas, which set out how an organisation's offsetting strategy should evolve over time to be considered net-zero aligned. We estimate that good quality offsets are likely to cost £20-50.



Requirements of an offset or inset

Regardless of the exact nature of the scheme, the following criteria are required for an offset/inset scheme to be credible, and a robust due diligence process should be implemented to ensure all criterion are met.

Below: criteria for a credible offsetting/insetting strategy

Criteria	Description
1 Real	All the GHG emission reductions or removal enhancements and the projects that generate them must be proven to have genuinely taken place.
2 Additional	Double causality: Reductions/removals would not have been realised if the project had not been carried out, and the project itself would not have been undertaken without the proceeds from the sale of carbon credits.
Based on realistic and credible baselines	Credited only beyond performance against a defensible, conservative baseline estimate of emissions that assumes the BAU trajectory in the absence of the activity. Baselines should be recalculated at a regular, conservative timeframe.
Monitored, reported and verified	Projects calculated in a conservative and transparent manner, based on accurate measurements and quantification methods. Must be verified by an accredited, third-party entity. MRV should be conducted at specified intervals.
Permanent	Only issued for GHG reductions or removals that are permanent or, if they have a reversal risk, must have requirements for a multi-decadal term and a comprehensive risk mitigation and compensation mechanism in place, with a means to replace any units lost.
6 Leakage accounted for and minimised	Leakage is defined as an unintended increase in GHG emissions caused by a project. E.g., a forest sequestration project that simply shifts deforestation activities to other forest land, thereby reducing or eliminating the net sequestration from the project.
7 Only counted once	Not double-issued or sold.

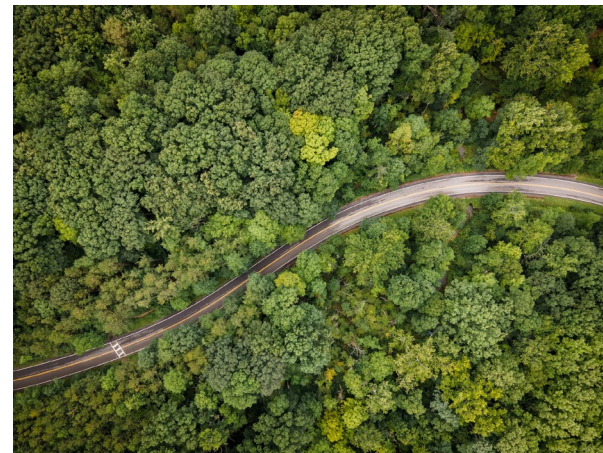
Target Review

6. Next steps

Next steps

Our analysis has provided a high-level assessment of the viability of achieving different targets across NSDC's portfolio, we recommend the following next steps:

- **Agree on approach to updating targets:** achieve senior sign off to any changes to target, communicating this to any relevant stakeholders.
- **Consider definition of the existing 2035 target:** NSDC could technically achieve its current 2035 carbon neutrality target immediately by purchasing offsets to balance emissions. This approach risks fostering complacency and slowing meaningful emissions reductions. In line with ISO 14068 and the SBTi Net Zero approach, we recommend defining the target to prioritise minimum direct carbon reductions before offsets are used. While carbon neutrality can be a step on the pathway to net zero, any investment in offsets should be balanced with direct mitigation efforts. Resources allocated to offsets should not come at the expense of investment in emissions reductions.
- **Planning for decarbonisation:** agree on a strategy and action for decarbonisation of each emissions source, detailing estimates for investment and resourcing requirements.
- **Corporate buildings:** begin to scope out detailed engineering works to decarbonise NSDC's corporate estate. Options for Southwell Leisure Centre and other buildings should be developed as these are not covered by existing surveys.
- **Monitoring of targets:** to achieve long-term targets (e.g. 2035), regular reviews of progress are required. NSDC should consider implementing interim and/or annual targets to monitor progress towards their existing carbon neutrality ambition.



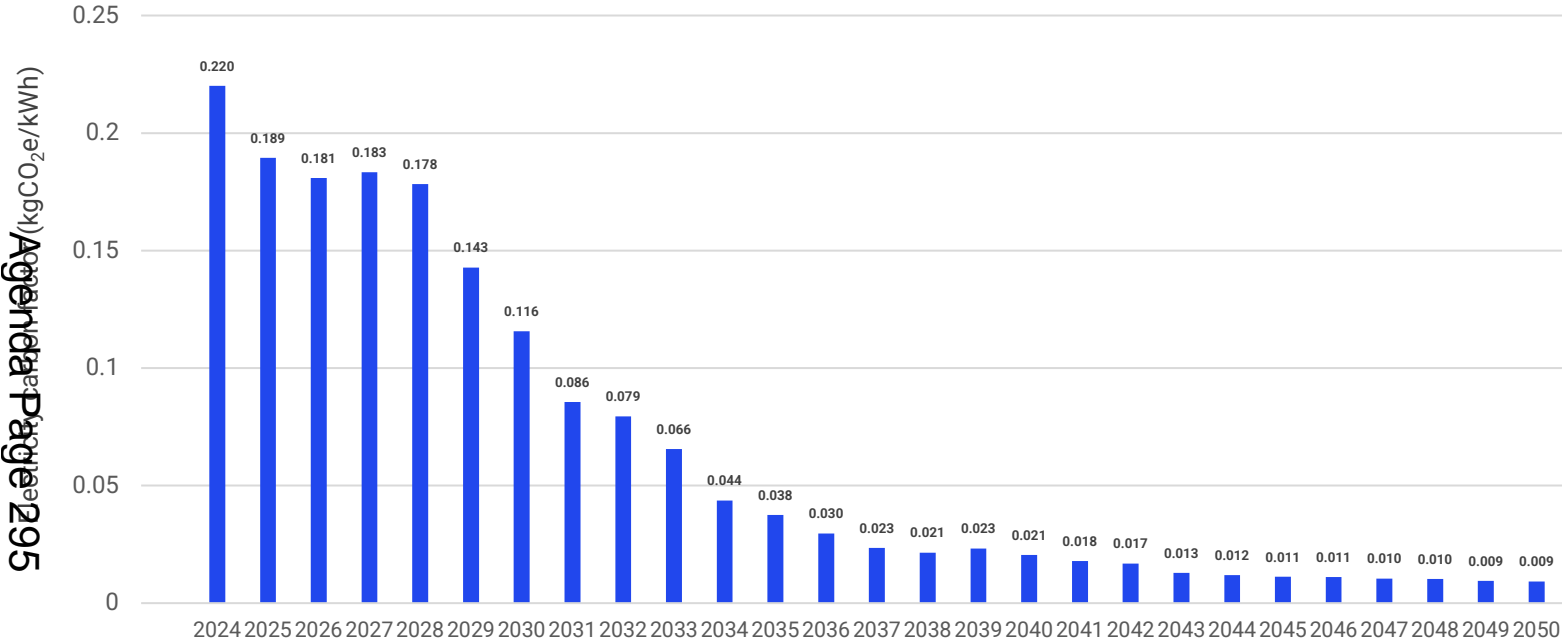
Target Review

Appendices

Appendix: National Grid Factors

Electricity carbon factor (kgCO₂e/kWh)

Future Energy Scenarios (2023), average of all scenarios



Appendix: NSDC Target Emissions



In the target set by NSDC in 2020, upstream Scope 3 emissions were not included. For clarity and consistency in reporting, we have now incorporated upstream Scope 3 emissions and updated the figures accordingly to reflect this revised methodology. We acknowledge that this adjustment may create the appearance that the original target is noted incorrectly and we provide this explanation to clarify the changes.

As a result, the totals presented for 2019/20 may not always align with NSDC's 2020 report and target.

Emission totals for 2019/20 and 2023/24, **excluding Scope 3 emissions** as per the 2035 target, are provided below:

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Emission source	2019 emissions (tCO ₂ e)	2024 emissions (tCO ₂ e)
Electricity	659	585
Fleet	857	1,138
Natural gas	628	1,150
Water	10	241
Waste	11	6
Total:	2,165	3,120

Appendix: Intervention Overview - NSDC Corporate

Extracted from BE Design report

Improvements Measures



	LED	Glazing	Walls	Roof	ASHP	Solar PV	Electric heating	GSHP
Newark Leisure Centre	★	★	★	★	★	★	★	★
Dukeries Leisure Centre	★	★	★	★	★	★	★	★
Newark Beacon	★	★	★	★	★	★	★	★
Sherwood Arts & Craft Centre	★	★	★	★	★	★	★	★
Wicars Water Visitor Centre	★	★	★	★	★	★	★	★
Tarrar Close - Store & Offices	★	★	★	★	★	★	★	★
Donce & Devon Visitors Centre	★	★	★	★	★	★	★	★
Brunel Drive Depot	★	★	★	★	★	★	★	★
Castle House Offices	★	★	★	★	★	★	★	★
Widworth Leisure Centre	★	★	★	★	★	★	★	★
National Civil War Centre	★	★	★	★	★	★	★	★
Palace Theatre	★	★	★	★	★	★	★	★

★ Applicable for the Asset

★ Not applicable for the Asset



Interventions highlighted in red apply to all scenarios

Appendix: Cost Overview - NSDC Corporate

Extracted from BE Design report

BUILDINGS	Lighting	Heat Pumps	Solar PV	Electric Heating	Fabric
Newark Leisure Centre	£116,550	£499,440	NA		
Dukeries Leisure Centre	£15,000	£313,720	£48,750		£408,220
Newark Beacon	£59,745	£256,050	NA		
Sherwood Arts & Craft Centre	£30,625	£105,000	£48,125		£366,881
Valley Water Visitor Centre	£8,120	£27,840	Already purchase		£48,566
Shropshire & Devon Visitors Centre	£4,375	£18,125	£14,000		£49,163
Edwinstown Leisure Centre	£19,320	NA	£55,825		£187,400
Castle House Offices	NA	NA	£28,613		
Panel Drive Depot	£43,764	£168,804	£74,375		£178,096
National Civil War Centre	£56,840	£146,160	NA		
Place Theatre	NA	£180,960	NA		
Far Close - Offices	£12,565	NA	£9,975	£3,231	£33,893
Far Close - Store	£20,860	£102,120	£54,425		£66,454

Appendix: NSDC Corporate, cost breakdown

Site	Approximate cost per site (£) – Scenarios 1 and 2	Approximate cost per site (£) – Scenarios 3 and 4	Recommended phasing
Newark Leisure Centre	616,000	616,000	Phase 1
Dukeries Leisure Centre	786,000	329,000	
Blidworth Leisure Centre	263,000	19,000	
Southwell Leisure Centre	n/a	n/a	
Newark Beacon	316,000	316,000	Phase 2
Bunel Drive Depot	465,000	213,000	
National Civil War Centre	203,000	203,000	
Palace Theatre	181,000	181,000	
Farrar Close Office	60,000	16,000	
Farrar Close Store	244,000	123,000	
Sherwood Arts & Crafts Centre	551,000	136,000	Phase 3
Vicar Water	85,000	36,000	
Scone and Devon Park	86,000	23,000	
Castle House	29,000	0	
Total	3,882,000	2,209,000	

Appendix: Corporate costs assumptions



- The changes in electricity and gas emissions are calculated using National Grid forecasts.
- Running costs, such as OPEX and general maintenance, are not included in the costings.
- Development costs are not included.
- VAT is excluded.
- Decreases and/or increases in natural gas and electricity bills as a result of the interventions are not included in the costings.
- Inflation has not been considered in the costings, Figures presented in the table below represent 2024 prices.

Appendix: Housing assumptions

Baseline data

- All properties were allocated as one of [26 archetypes](#), based on their built form, EPC, heating type and construction year.
- For properties where this data was not available, nearby buildings (based on postcode) were used to assume their attributes and archetype.
- Glow Simulator was used to create an energy profile for each archetype. This data is based on UK smart meter data and is therefore based on real world information.
- Demand profiles for each archetype were created assuming an average temperature year, assuming 88 winter days, 2 extreme winter days, 183 intermediate days and 92 summer days.
- Emissions from energy use were converted into emissions using Greenhouse gas reporting: conversion factors 2023.

Housing decarbonisation

- A variety of [retrofit strategies were allocated to each archetype](#), these reflected the level of retrofit each property required.
- For the purposes of modelling, buildings with the lowest EPC standards (i.e. EPC D-G) were selected to be retrofitted first.
- Costs for each intervention are [available here](#).
- The number of buildings retrofitted per year is required to significantly increase across all scenarios. This underscores the need for a gradual, year-on-year expansion of capacity. Careful consideration must be given to the required pace of growth to meet NSDC's decarbonisation targets. For instance, achieving decarbonisation by 2035 and 2050 demands an average of 510 and 215 retrofits per year, respectively.
- The UK Government's current policy proposals aim to require all private-rented properties with an EPC rating below D to achieve at least EPC C by 2030. This would necessitate upgrading approximately 3,677 properties to improve their energy efficiency ratings within this given timeframe. This target is likely to pose significant challenges considering the current pace and scale of retrofitting activities.
- Our model has outlined a phased approach to target properties but has not accounted for how the interventions themselves could be staged. Addressing this requires a more detailed portfolio analysis to identify optimal phasing strategies, taking into account factors such as property characteristics, prioritisation criteria, resource allocation and proposed EPC standards.

Appendix: Housing archetypes

All archetypes developed for the purposes of modelling are available below, these have been based on:

- Attributes relevant to heat loss calculations
- Attributes relevant to heat system decarbonisation
- Prevalence of the archetype in the stock

#	Archetype	Count	Average Electricity Consumption (kWh)	Average Heating Consumption (kWh)
1	Post 1930 semi-detached house; On-gas A-C	227	4266	13356
2	Pre 1930 semi-detached house; On-gas A-C	26	4263	17870
3	Post 1930 semi-detached house; On-gas D-G	858	4268	16494
4	Pre 1930 semi-detached house; On-gas D-G	292	4268	22136
5	Post 1930 detached house; On-gas A-C	15	4864	13826
6	All other detached houses; On-gas	5	4865	16603
7	Post 1930 terrace; On-gas A-C	191	3857	11068
8	Pre 1930 terrace; On-gas A-C	24	2965	11526
9	Post 1930 terrace; On-gas D-G	256	2965	16386
10	Pre 1930 terrace; On-gas D-G	46	2965	18252
11	Post 1930 bungalow; On-gas A-C	291	4178	10770
12	Post 1930 bungalow; On-gas D-G	1432	4180	13835
13	Pre 1930 bungalow; On-gas D-G	18	3940	13952
14	Post 1930 flat; On-gas A-C	1026	3524	7400
15	Pre 1930 flat; On-gas A-C	10	3524	7731
16	Post 1930 flat; On-gas D-G	434	3926	9935
17	Post 1930 maisonette; On-gas A-C	85	3927	12319
18	Post 1930 maisonette; On-gas D-G	85	3876	11885
19	Post 1930 semi-detached house; Electric A-C	14	4287	3020
20	Semi-detached house; Electric D-G	35	7278	10810
21	Pre 1930 terrace; Electric D-G	6	3897	3686
22	Post 1930 bungalow; Electric D-G	98	8001	9082
23	Post 1930 flat; Electric	12	3934	2752
24	Post 1930 semi-detached house; Off-gas D-G	28	4221	16376
25	Pre 1930 semi-detached house; Off-gas D-G	19	4200	21635
26	Bungalow; Off-gas D-G	70	4263	13830

Appendix: Housing interventions



Archetype	Low retrofit scenario			High retrofit scenario		
	Retrofit package measure	EE measures	CAPEX	Retrofit package measure	EE measures	CAPEX
Post 1930 semi-detached house; On-gas A-C	Individual 8kW ASHPs.	-	£11,728	Individual 8kW ASHPs plus air tightness improvements.	Air tightness	£12,902
Pre 1930 semi-detached house; On-gas A-C	Individual 9kW ASHPs. Update hot water cylinder.	-	£13,919	Individual 9kW ASHPs. Update hot water cylinder plus air tightness improvements.	Air tightness	£15,697
Post 1930 semi-detached house; On-gas D-G	Individual 8kW ASHPs plus basic energy efficiency measures.	Loft top-up and solid floor insulation	£17,069	Whole house deep retrofit to net zero energy standard including 6kW ASHP and a package of insulation and air tightness measures.	Whole house deep retrofit	£47,061
Pre 1930 semi-detached house; On-gas D-G	Individual 8kW ASHPs. Update hot water cylinder plus basic energy efficiency measures.	Loft and suspended floor insulation	£17,521	Whole house deep retrofit to net zero energy standard including 6kW ASHP and a package of insulation and air tightness measures.	Whole house deep retrofit	£62,696
Post 1930 detached house; On-gas A-C	Individual 9kW ASHPs.	-	£12,474	Individual 9kW ASHPs plus air tightness measures.	Air tightness	£14,478
All other detached houses; On-gas	Individual 9kW ASHPs plus basic energy efficiency measures.	Loft top-up and solid floor insulation	£20,339	Whole house deep retrofit to net zero energy standard including 8kW ASHP and a package of insulation and air tightness measures.	Whole house deep retrofit	£70,836
Post 1930 terrace; On-gas A-C	Individual 6kW ASHPs.	-	£9,276	Individual 6kW ASHPs.	-	£9,276
Pre 1930 terrace; On-gas A-C	Individual 8kW ASHPs. Update hot water cylinder.	-	£13,173	Individual 8kW ASHPs. Update hot water cylinder plus air tightness improvements.	Air tightness	£13,902
Post 1930 terrace; On-gas D-G	Individual 6kW ASHPs plus basic energy efficiency measures.	Loft top-up and solid floor insulation	£14,475	Whole house deep retrofit to net zero energy standard including 6kW ASHP and a package of insulation and air tightness measures.	Whole house deep retrofit	£44,813
Pre 1930 terrace; On-gas D-G	Individual 8kW ASHPs. Update hot water cylinder plus basic energy efficiency measures.	Loft and suspended floor insulation	£18,424	Whole house deep retrofit to net zero energy standard including 6kW ASHP and a package of insulation and air tightness measures.	Whole house deep retrofit	£55,689
Post 1930 bungalow; On-gas A-C	Individual 6kW ASHPs.	-	£9,276	Individual 6kW ASHPs plus air tightness improvements.	Air tightness	£10,278
Post 1930 bungalow; On-gas D-G	Individual 6kW ASHPs plus basic energy efficiency measures.	Loft top-up and solid floor insulation	£17,141	Whole house deep retrofit to net zero energy standard including 6kW ASHP and a package of insulation and air tightness measures.	Whole house deep retrofit	£37,526
Pre 1930 bungalow; On-gas D-G	Individual 6kW ASHPs. Update hot water cylinder plus basic energy efficiency measures.	Loft and suspended floor insulation	£20,170	Whole house deep retrofit to net zero energy standard including 6kW ASHP and a package of insulation and air tightness measures.	Whole house deep retrofit	£39,403
Post 1930 flat; On-gas A-C	Shared ambient ground loop for block of flats. Individual heat pump within each flat (4kW).	-	£17,941	Shared ambient ground loop for block of flats. Individual heat pump within each flat (4kW) plus air tightness improvements.	Air tightness	£18,393
Pre 1930 flat; On-gas A-C	Individual heat pump within each flat (4kW). Update hot water cylinders.	-	£8,762	Individual heat pump within each flat (4kW). Update hot water cylinders plus air tightness improvements.	Air tightness	£19,919
Post 1930 flat; On-gas D-G	Shared ambient ground loop for block of flats. Individual heat pump within each flat (4kW) plus basic energy efficiency measures.	Air tightness	£19,856	Shared ambient ground loop for block of flats. Individual heat pump within each flat (4kW) plus a package of insulation and air tightness measures.	Solid wall and air tightness	£27,755
Post 1930 maisonette; On-gas A-C	Shared ambient loop GSHP.	-	£17,941	Shared ambient loop GSHP plus individual air tightness improvements.	Air tightness	£18,393
Post 1930 maisonette; On-gas D-G	Shared ambient loop GSHP plus basic energy efficiency measures.	Air tightness	£19,856	Shared ambient loop GSHP plus a package of insulation and air tightness measures.	Solid wall and air tightness	£27,755
Post 1930 semi-detached house; Electric A-C	-	-	£0	-	-	£0
Semi-detached house; Electric D-G	Basic energy efficiency measures.	Loft top-up and solid floor insulation	£5,341	Deep retrofit and air tightness measures.	Whole house deep retrofit	£58,100
Pre 1930 terrace; Electric D-G	Basic energy efficiency measures.	Loft and suspended floor insulation	£5,052	Deep retrofit and air tightness measures.	Whole house deep retrofit	£55,689
Post 1930 bungalow; Electric D-G	Basic energy efficiency measures.	Loft top-up and solid floor insulation	£7,865	Deep retrofit and air tightness measures.	Whole house deep retrofit	£37,526
Post 1930 flat; Electric	-	-	£0	-	-	£0
Post 1930 semi-detached house; Off-gas D-G	Individual 8kW ASHPs. Update hot water cylinder and heat emitters plus basic energy efficiency measures.	Loft top-up and solid floor insulation	£21,058	Whole house deep retrofit to net zero energy standard including 6kW ASHP, heat system upgrades and a package of insulation and air tightness measures.	Whole house deep retrofit	£47,061
Pre 1930 semi-detached house; Off-gas D-G	Individual 8kW ASHPs. Update hot water cylinder and heat emitters plus basic energy efficiency measures.	Loft and suspended floor insulation	£21,510	Whole house deep retrofit to net zero energy standard including 6kW ASHP, heat system upgrades and a package of insulation and air tightness measures.	Whole house deep retrofit	£62,696
Bungalow; Off-gas D-G	Individual 6kW ASHPs. Update hot water cylinder and heat emitters plus basic energy efficiency measures.	Loft top-up and solid floor insulation	£21,130	Whole house deep retrofit to net zero energy standard including 6kW ASHP, heat system upgrades and a package of insulation and air tightness measures.	Whole house deep retrofit	£38,346

Appendix: Housing retrofit cost estimates

Intervention	Cost	
Boiler replacement subsidy/grant	£7,500	
4/5 kW ASHP	£7,317	
6 kW ASHP	£9,276	
8 kW ASHP	£11,728	
9 kW ASHP	£12,474	
Shared ground loop and individual GSHP	£17,941	
Hot water cylinder and pipework	£1,445	
Upgraded triple panel convector radiators (5 kW)	£1,590	
Upgraded triple panel convector radiators (6 kW)	£1,908	
Upgraded triple panel convector radiators (8 kW)	£2,544	
Upgraded triple panel convector radiators (9 kW)	£2,862	
Upgraded double panel convector radiators (5 kW)	£1,269	
Upgraded double panel convector radiators (6 kW)	£1,523	
Upgraded double panel convector radiators (8 kW)	£2,031	
Upgraded double panel convector radiators (9 kW)	£2,285	
Radiator pipework	£14	/m ² floorspace
High performance triple glazing	£150	/m ² glazed area
Cavity wall insulation	£9	/m ² wall area
Cavity wall insulation top-up	£5	/m ² wall area
Solid wall insulation	£180	/m ² wall area
Loft insulation	£19	/m ² roof area
Loft insulation top-up (house)	£608	
Solid floor insulation	£125	/m ² floor area
Suspended floor insulation	£102	/m ² floor area
Air tightness improvements (inc. draught proofing and sealing)	£29	/m ² glazed area



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Completed and ongoing carbon reduction initiatives

1.0 Switching our Fleet to Hydrotreated Vegetable Oil (HVO)

1.1 Feasibility work has been undertaken to explore the benefits that may be available should we switch to HVO usage across our fleet. HVO offers a wide range of benefits that make it an excellent environmentally friendly alternative to diesel fuels:

- HVO is made from 100% renewable Raw Materials.
- A drop-in replacement for regular diesel with no change to infrastructure or modifications.
- Up to net 90% Net reduction of Green House Gas emissions.
- Reduction in regulated air pollutants (NOx/SOx/PM/CO)
- Biodegradable
- Shelf life of ten years in comparison with two years for Regular Diesel, depending on storage conditions.
- Tried and tested product; its clean and safe and endorsed by a wide range of OEMS.
- Excellent cold weather performance, with a high cetane number of up to 90, HVO provides improved cold start performance, clean combustion and less chance of waxing in extreme temperatures.
- Average 10% reduction on Ad blue consumption
- Potential saving Fuel economy (current data suggest 4-10% dependent upon engine)

1.2 On Switching to HVO we would immediately see a reduction in CO2 of up to 90% in the fleet emissions, which would be a reduction of approximately 33% of our total carbon footprint. That's a saving of 1,018.8 tonnes of CO2. That is the equivalent of having 46,864.8 adult trees offsetting our carbon, which about 30 hectares of trees. That is an area of about thirty times as big as Trafalgar Square. This is an initiative that is built into the budget for 2025/2026 and once full feasibility and risk assessment is complete could be introduced if approved by all stakeholders.

2.0 **Decarbonisation Plan**

As part of the Climate Emergency action plan NSDC are committed to delivering and installing low carbon heating measures at a range of Council buildings before 2035. The Carbon Trust recommended Air Source Heat Pumps as the low carbon technology. However, before installing this technology on large scale sites (which requires significant investment) we must ensure this new technology is appropriate and consider all fossil fuel free options.

2.1 As such, we engaged BE Design, Newark-based consultants, to develop a Decarbonisation Plan for our corporate and leisure buildings. This plan will advise on the energy efficiency measures and carbon reduction improvements we can put in place at each site.

2.2 The Decarbonisation Plan has recently been completed and shows a detailed road map of the technologies and strategies we could put in place as well as the associated costs to achieve the energy savings and reduction in carbon emissions. The sites included in this review are listed below.

- Blidworth Leisure Centre
- Brunel Drive Depot
- Car Parks
- Castle House
- Dukeries Leisure Centre
- Farrar Close
- Newark Beacon
- NSFC
- Palace and Civil War Museum
- Sconce and Devon
- Sherwood Arts and Craft Centre
- Vicar Water

2.3 Each site has its own breakdown of consumption, improvement areas and associated CO2 reduction and costings that give a very granular level of detail, which is essential when calculating the CO2 reduction we are looking for.

3.0 Solar PV installation

- 3.1 Our Climate Emergency Strategy Action plan outlines recommended carbon reduction initiatives which the Council can undertake to improve energy efficiency and reduce its overall carbon footprint. This includes the installation of Solar PV. As such we undertook feasibility works in collaboration with specialist consultants to consider the intricacies of Solar PV installation on a range of its corporate and leisure sites to gain further understanding in relation to costs involved, payback, carbon savings and if installation is practical.
- 3.2 The outcome of the feasibility study was presented to members at Policy & Finance Committee in November 2021 with a £685,250 budget approved for installation on the sites listed below. Due to tight management and efficiencies the work will be delivered for considerably less. The monies saved will be recycled into further projects to help reduce our carbon footprint. All sites are now installed.

Installation site	Forecast annual electricity generation (Kwh)	Carbon reduction (tonnes per annum)
Newark Leisure Centre	160078	33.933
Dukeries Leisure Centre	73463	15.568
Newark Beacon	46919	9.941
Sconce and Devon Park	896.05	4.032
Vicar Water	19120	4.032
Broadleaves	77350	17.43
Gladstone	92820	20.92
	Total energy generation	Total CO2e reduction
	470,646.05 Kwh/year	105.856 tCO2e

- 3.3 The savings above are indicative of what will be saved throughout the year and will be recalculated after 12 months post installation when actual figures are available.

- 3.4 Potential additional sites and indicative costs. (These are taken from 2021's feasibility study and therefore these costs are illustrated as a minimum for awareness of the level of investment that would be required.)

Additional Solar PV options



Narrative	For future review			Not at this time
	Castle House	Brunel Drive Depot	Total	Blidworth Leisure Centre
Construction	72,550.00	166,300.00	238,850.00	32,550.00
Project Management	4,500.00	4,500.00	9,000.00	4,500.00
Capital Costs	77,050.00	170,800.00	247,850.00	37,050.00
Financing				
Annual MRP (25 year life)	3,082.00	6,832.00	9,914.00	1,482.00
Interest - 2.23%	1,718.22	3,825.92	5,544.14	826.22
	4,800.22	10,657.92	15,458.14	2,308.22
Cost of Maintenance	305.00	762.50	1,067.50	109.80
Annual Costs	305.00	762.50	1,067.50	109.80
Total Annual Costs	5,105.22	11,420.42	16,525.64	2,418.02
Annual Electricity Savings	4,639.29	10,747.68	15,386.96	2,182.32
Net Annual Surplus/Loss	-465.93	-672.74	-1,138.67	-235.70
Payback Period	27.51	26.56	26.85	27.70
Annual Carbon Savings (IC02e)	10.00	TBC	10.00	4.00

- 3.5 The completion of this project will assist the Council with making carbon savings and generating renewable energy which will assist us with reaching our 2035 net zero target.

4.0 **New build program**

The Council's new build properties are designed and built to an excellent specification around net zero efficiencies. This is allowing us to provide energy efficient homes to our residents. Our properties have been benefiting from these net zero efficiencies for the last 4 years. Alexander Lodge was shortlisted for a carbon reduction reward in 2024 and came runner up. However, our new build scheme in Blidworth was announced the winner of the LABC regional award for best social housing new build 2024.

- 4.1 **Insulation.** The standard building regulations cavity wall insulation is 150mm, Newark and Sherwood new build properties, are now built with an increased 185mm of cavity wall insulation. The standard insulation for lofts is 270mm our standard loft insulation thickness is 300mm
- 4.2 **Air sealing.** Building regulations require an air tightness result of 10m² hr. The Council's new build properties' average test results are below 5m² hr.
- 4.3 **Energy-Efficient appliances.** The Council's new build properties, use low energy appliances NSDC install as standard A rated electric combi boilers, LED lighting, EV chargers, and in many situations waste water heat recovery systems.
- 4.4 **Solar panels.** These can deliver electricity at 60-70% of the cost of grid electricity and when batteries are also fitted this can rise to 80 - 90% by using cheaper night tariffs to force charge

5.0 **Solar installations within the Council's housing stock**

- 5.1 There are 430 properties fitted with income generating solar panels and approx. 107 properties that have had solar panels and batteries fitted as part of our Social Housing Decarb Funding and funding received from Devolution. This is representative of around 10% of the council's housing stock.

6.0 Electric Vehicle Charge Points

- 6.1 The Climate Emergency action plan commits us to exploring the implementation of electric vehicles within the Council owned fleet of vehicles. It was agreed at Leisure and Environment Committee on 16 March 2021 to adopt a phased approach towards electrification. This began with the pilot of two vehicles which have been used by our Community Protection team for short journeys in the district within the past two years. There are now 3 charge points at Brunel Drive and work is currently ongoing to upgrade the EV charge points outside the back of Castle House to enable faster charging of our Community Protection vehicles.

7.0 Tree planting

- 7.1 Since Q4 2019/2020 The Council have facilitated the planting of 26,982 trees in the district (gifted 15,944 and planted 11,038). This year, plans are in place to eclipse this in a shorter timeframe by planting 34,000 trees as part of a wider woodland regeneration scheme. Once fully matured we expect these trees to sequester at least 845 tonnes of CO₂ per year

Tree Sequestration (Kg Per Annum)		Number of Trees Planted			75% survival rate			Tree Sequestration (Co2t Per Annum)		
Min	Max	Thorney Abbey & Little Carlton	NSDC sites	Total	Thorney Abbey & Little Carlton	NSDC sites	Total	Min	Median	Max
10	40	34,000	11,038	45,038	25,500	8,279	33,779	338	845	1,351

8.0 Utility tariff review

- 8.1 A full review of our electricity tariffs is well underway and in the final stages. The hope here is that we can secure a 'green tariff' that will not only provide financial savings but also offer significant carbon savings which would reduce our scope 2 and scope 3 emissions associated with electricity use.

9.0 **Green Rewards programme**

- 9.1 Green Rewards is an app encouraging users to perform sustainable actions through incentivisation. The app provides a number of activities that fall under 7 categories. Fashion Footprint, Food, Travel, Energy and Carbon, Reduce, Reuse, Recycle, Consumption and Nature. Completing activities will earn users varying amounts of 'Green Points' and the user with the most Green Points each month will win £20 vouchers. Being signed up to the app alone will provide users with access to discounts and alongside that, a user will be selected at random each month to win a £20 voucher.
- 9.2 There are currently 656 residents signed up to the Green Rewards app, this is an increase of 13.7% since March 2024 and the number is growing each month. Out of the six Councils involved in the Green Rewards programme, our residents are the most active, completing 72.1 actions on average per person. Due to the consistent and high number of actions completed by our residents, Newark & Sherwood District has avoided 101,619kg of CO₂e since beginning our involvement in the programme in 2021.

10.0 NSDC Corporate decarbonisation plan delivery forecast

	Carbon trust proposals	NSDC revised program of site improvements. Taking account of building age and recent capital investment improvements.	Carbon Reduction Update 2025	Implementation timeframe, 2030 Target (Scenarios 1 and 3)	Implementation timeframe, 2035 Target (Scenarios 2 and 4)
Phase 1	Newark Leisure Centre Dukeries Leisure Centre Southwell Leisure Centre* Blidworth Leisure Centre*	Vicar Water Blidworth Leisure Centre* Newark Beacon Sconce and Devon Park Newark Leisure Centre Dukeries Leisure Centre	Solar Completed Air Source Heating Completed Solar Completed LED Planned 2025 Solar Completed LED Completed Solar Completed LED Planned 2025 Solar Completed	2025-26	2025-28
Phase 2	Palace Theatre Brunel Drive Depot Newark Beacon National Civil War Centre Farrar Close Store & Office*	Brunel Drive Depot Castle House Sherwood Arts & Crafts Centre	Part LED completed Part Solar Completed Efficient Air Con /part LED Completed	2027-28	2029-31
Phase 3	Castle House Vicar Water Sconce and Devon Park Sherwood Arts & Crafts	Palace Theatre National Civil War Centre	Conservation and listed building Conservation and listed building	2029-30	2032-35
*On Hold		Southwell Leisure centre Farrar Close Store & Office Blidworth Leisure Centre	Pending Investment Decisions Planned Demolition in 2025/26 Not Solar suitable		

Local Area Energy Plan (LAEP)

What is it?

- The LAEP is an evidence-based approach led by local government and developed collaboratively. The information gathered will lead to the development of a masterplan identifying the most cost-effective pathway for local areas to reach net zero targets and realise local benefits.

Timeline:

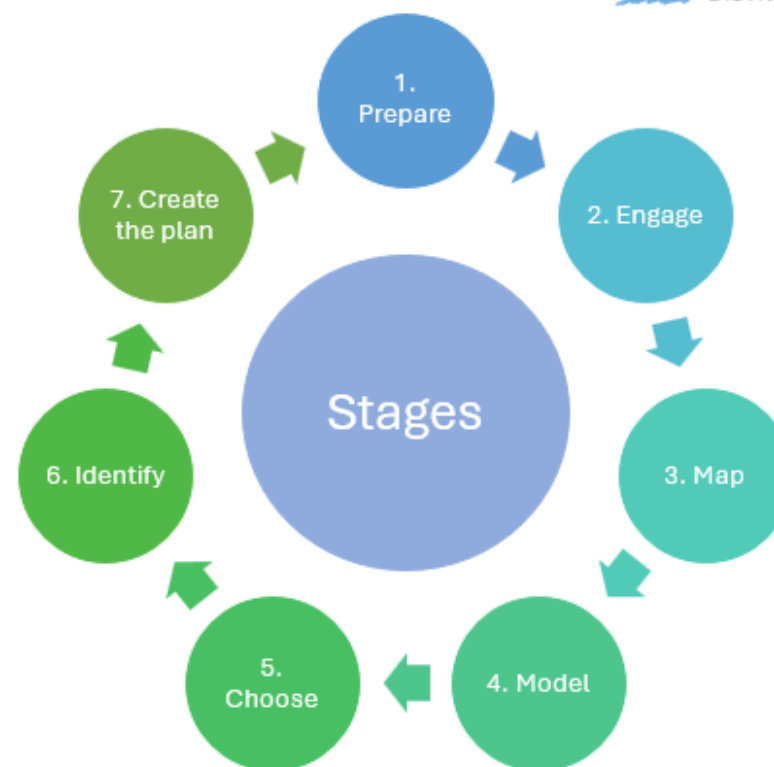
- Phase 1: Sept 24 – May 25 (Stage 1-4)
- Phase 2: June – July 25 (Stage 5-6)
- Phase 3: July – Sept 25 (Stage 7)

Scope:

- Carbon Emissions across the District
- Energy Use across the District

Targets:

- Reach Carbon Net Neutrality by 2035



Local Area Energy Plan (LAEP)

Energy Use Scope

